

1

2

3

4

5 SELECT COMMITTEE TO INVESTIGATE THE  
6 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
7 U.S. HOUSE OF REPRESENTATIVES,  
8 WASHINGTON, D.C.

9

10

11

12 INTERVIEW OF: KYLIE KREMER

13

14

15

16 Wednesday, January 12, 2022

17

18 Washington, D.C.

19

20

21 The interview in the above matter was held via Webex, commencing at 10:06 a.m.

1

2     Appearances:

3

4

5     For the SELECT COMMITTEE TO INVESTIGATE

6     THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8     [REDACTED] INVESTIGATIVE COUNSEL

9     [REDACTED] CHIEF INVESTIGATIVE COUNSEL

10    [REDACTED] INVESTIGATIVE COUNSEL

11    [REDACTED] RESEARCHER

12    [REDACTED] INVESTIGATIVE COUNSEL

13    [REDACTED] SENIOR INVESTIGATIVE COUNSEL

14    [REDACTED] SENIOR INVESTIGATIVE COUNSEL

15

16     For KYLIE KREMER:

17

18     DAVID WARRINGTON

19     MIKE COLUMBO

20     ERIN POTTER



1

2 [REDACTED] This is a transcribed interview of Ms. Kylie Kremer conducted by  
3 the House Select Committee to Investigate the January 6th Attack on the United States  
4 Capitol pursuant to H. Res. 503.

5 At this time, I'd ask the witness to please state your full name and spell your last  
6 name for the record.

7 Ms. Kremer. Kylie Jane Kremer, K-R-E-M-E-R.

8 [REDACTED] Thank you. This will be a staff-led interview, and members, of  
9 course, may choose to also ask you questions. In the room today, we have [REDACTED]  
10 [REDACTED], myself, investigative counsel. We have [REDACTED], chief investigative  
11 counsel, [REDACTED] senior investigative counsel, [REDACTED] senior investigative  
12 counsel, [REDACTED] investigative counsel, [REDACTED] investigative counsel. I believe  
13 that is everyone from the staff that we have present. There are no members present  
14 currently.

15 I would like to note for the record what has been previously marked as exhibit 1 is  
16 the subpoena from Ms. Kylie Kremer, which is dated September 29th, 2021. You are  
17 here for a transcribed interview pursuant to the subpoena.

18 At this time, I would ask counsel to please state their names for the record as well.

19 Mr. Warrington. Yeah. David Warrington on behalf of Ms. Kremer along  
20 with -- participating with me is my colleague, Mike Columbo, counsel for Ms. Kremer also,  
21 and our assistant, Erin Potter.

22 [REDACTED] Thank you. So we also have an official reporter transcribing the  
23 record of this interview. Please wait until I ask each question and have completed  
24 before you begin your response, and we will try to wait, and I always emphasize "try."  
25 We're going to try to wait until your response is completed before we ask our next

1 question. The stenographer cannot record non-verbals as well, such as shaking your  
2 head, so it's important that you answer each question with an audible, verbal response.

3 We ask that you provide complete answers based upon your best recollection.  
4 That's all we're asking is just for your best recollection. If the question is not clear, just  
5 ask one of us for clarification. If you do not know the answer, also, please just say so.

6 Before we get started, I would like to remind you that it's unlawful to deliberately  
7 provide false information to Congress. So, for this interview, providing false information  
8 could result in criminal penalties for perjury and/or false statements. So do you  
9 understand that, Ms. Kremer?

10 Ms. Kremer. Yes, sir.

11 [REDACTED] Logistically speaking, we are virtual, so if you need a chance to  
12 speak with your counsel, please just let us know. We'll mute, go off camera, you all can  
13 communicate however you choose, and then we'll come back on afterwards. Also, if  
14 you need to take any breaks, comfort breaks or anything like that, please just let us know,  
15 and we'll also take a brief recess. I'll try to fit in some comfort breaks maybe every hour  
16 to 90 minutes. That way, you know, we're staying fresh, and we can do what we need  
17 to do, and then we'll come back on and continue with the questions.

18 There may be several people asking you questions here today. We'll do our best  
19 to try to keep it organized so you know exactly who's addressing you. And if you  
20 don't -- again, if you don't understand the question, please just ask us to repeat it, okay?

21 Ms. Kremer. Okay.

22 EXAMINATION

23 By [REDACTED]

24 Q All right. So we'll -- we're going to start with a little bit about your  
25 background.

1 I believe you're the executive director For Women for America First. Is that  
2 correct?

3 A Yes, sir.

4 Q Can you just describe to us how Women for America First was founded, like  
5 when it was founded, what it was founded for?

6 A It was founded in February of 2019, I believe, founded by myself and my  
7 mother, Amy Kremer. She's the chairman, and our colleague and board member,  
8 Jennifer Hulse. We have done work all across the United States working with  
9 grassroots activists, and our mission for the organization was to empower and engage  
10 with women to inspire them to make a difference and have their voices heard in the  
11 political discourse.

12 Q Thank you. So as executive director, like, what are your responsibilities?  
13 Just help us understand kind of your day-to-day of what you're responsible for.

14 A Well, currently, it's been focused on the subpoena. Previously before, I  
15 guess, January 6th, we held events all across the country in various locations, depending  
16 on what the political dialogue was going on in that area and grassroots activists asking for  
17 us to get involved. We would hold conferences, women's luncheons, giving people the  
18 tools to educate voters, and that sort of thing. I worked with a number of people from  
19 across the country in different capacities to do all of these events alongside with my  
20 mother.

21 Q So as far as an organization, I heard you mention your mother, Ms. Amy  
22 Kremer, and then Ms. Jennifer Hulse. Are there any other folks that you consider  
23 leaders, or, I guess, in the management of Women for America First?

24 A No. It would just be the three of us.

25 Q Gotcha. Before Women for America First, I hear you talking about, like,

1 grassroots and organizing. Did you have any roles on former President Trump's  
2 campaign or in the White House or anything like that?

3 A No, sir, I did not.

4 Q Okay. And before -- let's think before the election of 2020. Just give me,  
5 like, an example. I know you mentioned some conferences or meetings, but give us  
6 some examples of the types of events. And if you can give me, like, specifics for a  
7 couple just so that we have a better framework of what you all were doing before the  
8 election.

9 A We took the Angel families to Washington, D.C. to have their voices heard.  
10 We did stuff to support the nomination of Supreme Court Justice Amy Coney Barrett. Is  
11 that -- is that enough?

12 Q Yeah. No. Those are -- those are two good examples. Thank you.  
13 And, also, so while you're doing this grassroots organizing, I'm assuming did you come  
14 across, like, other organizers such as Ali Alexander while doing this work before the  
15 election?

16 A Yes.

17 Q And what -- like, let's focus on Ali, Mr. Alexander, for example. What was  
18 your impression of him pre-election from doing the grassroots organizing with him?

19 A I've known Ali for a very long time, probably 10-plus years. And he has a  
20 very shady background, but I did call him a friend because it's kind of the devil that you  
21 know. You would rather keep him close than to have his target set on you because he  
22 has made many lives of many people very miserable, and I've watched that happen.

23 Q Gotcha. So you were aware of this before the election of 2020 about  
24 Mr. Alexander?

25 A Oh, certainly. I mean, he's a felon.

1 Q Okay. Outside of that felon -- I guess the felony conviction, what  
2 was -- like, what made you think that he was a shady character? I think you said shady  
3 just now, so what -- what made you think that?

4 A I've never seen him have any real specific job. I've never really understood  
5 where he gets paid from and the different projects of how he comes to know certain  
6 groups of people. It always just seems a little awkward to me.

7 Q And did you all do any, I guess, work with him pre-election 2020?

8 A I'm sure at some point along the way, there were different things. I know  
9 he had a thing called Blog Bash at CPAC for a number of years that I helped with. I'm  
10 sure that there may have been other projects that we worked on.

11 Q Okay. Thank you. So let's now go to election of 2020. It's Election Day.  
12 What were your expectations for the election on Election Day?

13 A I believed that President Trump was going to win, that Georgia was going to  
14 remain in Republican control, and that we would be celebrating.

15 Q So -- but that changed by the end of the night, right? Like you -- by the end  
16 of the night, you were starting to think that President Trump might lose the election. Is  
17 that fair to say?

18 A I would say more towards the middle of the night, but yes.

19 Q The middle. Okay. And what made you start to believe that the election  
20 wasn't going in favor of President Trump?

21 A Well, I was watching, I'm sure, along with every other American on their TVs  
22 at home what the news was reporting and seeing, you know, massive ballot dumps and  
23 suitcases being brought in and various issues throughout the country of people kind of  
24 saying, we need help. Something amiss is going on here in our local precinct or election,  
25 voting count, vote counts.

1 Q So you just talked about, like, the dumps, but you didn't really say that in  
2 messages. I didn't see that, at least, right? It just looked like you said -- you and your  
3 mother were discussing that it looked like President Trump was going to lose. Is that  
4 fair?

5 A Yes.

6 Q Okay. So you all weren't discussing dumps of votes or anything the night of  
7 the election, right?

8 A I don't specifically remember what we were talking about on the night of the  
9 election.

10 Q Okay. Can we go to exhibit -- do you have the exhibits in front of you?  
11 Were you able to get the exhibits?

12 A I do. Can you give me one second?

13 Q And if not, we can put it on the screen, whatever is easier for you. And I  
14 want to direct you to exhibit 7.

15 [REDACTED] [REDACTED] would you like me to put the exhibit up?

16 [REDACTED] Let's see.

17 BY [REDACTED]

18 Q Ms. Kremer, are you able to put the exhibits up?

19 A I don't have -- oh. I have the password. One second.

20 Q Okay. No worries.

21 A Exhibit 7?

22 Q Exhibit 7. And once you get that open, we'll go to -- at the bottom of the  
23 page, it will be KKremer5784. And I believe these are text messages between you and  
24 your mother, Ms. Amy Kremer.

25 A Okay. So I'm looking for 5784?

1 Q Yep. It's towards the bottom. I believe it's -- if you're looking at the PDF  
2 number, it will be page 320 out of 337.

3 A Okay. One second. I'm almost there. Okay.

4 Q So I'll just give you a second just to read page 5784. I believe the date of  
5 these messages is November 3rd, 2020. It's the middle of the night, like you described,  
6 around 10 p.m., and it goes into KKremer5783 which is the page before. But it looks like  
7 you all are discussing the election results, and just so we're clear, I don't see any  
8 discussion between you and your mother about vote dumps or any type of illegal voting  
9 activity. Is that fair to say?

10 A Yes. That's fair. I was at an election night party, and my mom was at  
11 home.

12 Q Okay. Thank you. Thank you.

13 And so after the election, after -- actually, the night after the day after, so  
14 November 4th, it looks like you and your mom start to discuss plans moving forward, and  
15 you all immediately start planning a march for President Trump, right?

16 A Yes. Well, I wouldn't --

17 Q Can you walk us --

18 A -- specifically -- march for Trump was not the first wording of it, but we  
19 started to plan moving forward what were our next steps.

20 Q Perfect. So help us understand. What was -- what were you planning as  
21 the next steps on November 4 because it looks like you all immediately turned your  
22 efforts to that. So tell us what you were planning?

23 A I was talking with people all across the country, people -- same with my  
24 mother. We were hearing a lot of unrest and people wanting to know what it is that we  
25 can do to demand transparency and make sure that every legal ballot that is cast is

1 counted, and every legal -- illegal ballot that was cast is thrown out or dismissed.

2 So I started the Stop the Steal Facebook group on Facebook, obviously, and  
3 started it under Women for America First because we have a verified account. So it was  
4 a subgroup under that, and it quickly went viral.

5 Q Got it. Okay. So there wasn't, like, a specific event that you all were  
6 planning like in the November 4th timeframe? It was just -- was it organizing? Is that  
7 fair to characterize? You were just organizing and hearing people's concerns?

8 A Yes. It was a -- a conversation to be had about what people are seeing in  
9 their local areas and how we can come together and figure out how to make sure that we  
10 see a free and fair election.

11 Q So then, tell us what happened. I was going to get to this next, so it was  
12 perfect for you to mention the Stop the Steal Facebook group. Tell us what happened  
13 with that. I believe it was taken down, but just help us understand what was going on at  
14 that time?

15 A You know, it started, and it took off like wildfire. I think it was growing by  
16 1,000 people every 10 seconds, which kind of broke a lot of algorithms. You can't pay  
17 for something to grow that virally, and 2.1 million people were waiting in queue when it  
18 was shut down. And it was a group that people were voicing concerns and seeing what  
19 was going on in their local area, but people were joining it and posting on it so fast that  
20 there were so many things that were not even visible for us to see.

21 So from that point, we decided, you know, to continue talking with different  
22 people across the country and told people to start showing up at their State capitals or  
23 where they were counting ballots to let people know that they're watching, and they  
24 need to be making sure that they're following the law and going to be held accountable  
25 for the process that the local laws had established.



1 Q Approximately how many members did the group have when it was taken  
2 down, if you remember?

3 A I don't remember specifically. 2.1 million people were waiting in queue to  
4 join it, but I don't remember how many it was specifically.

5 Q Okay. And do you remember approximately when it was taken down, just  
6 so we can put it on, like, kind of a timeline for myself?

7 A Somewhere between the election and a couple of days after it was started.  
8 Maybe even -- not even 24 hours.

9 Q And the term for the Stop the Steal group, how did you come up with the  
10 term of using that for your subgroup?

11 A It was something that was kind of trending everywhere, and people were  
12 saying it, and felt like the election was being stolen before our eyes, so it kind of just  
13 made sense to call it that.

14 Q So this wasn't -- was this a term that you had created or something that you  
15 said you just saw trending online?

16 A Just saw online.

17 Q Did you participate in any demonstrations or rallies, and this is before the  
18 November 14th Million MAGA March. So between the election and the Million MAGA  
19 March, did you participate in any demonstrations or lead any organization efforts in that  
20 time period?

21 A Well, I don't know what the Million MAGA March is, but November 14th, our  
22 event at Freedom Plaza, I think is what you're referring to. However, yes, there were  
23 events that were going on all across the country, and I participated in the ones that were  
24 in Atlanta.

25 Q Gotcha. And what did you -- what was your role in participating in the ones

1 in Atlanta?

2 A Bringing people together. There were, at first, just a small number of  
3 people where discussions were being had about what people were reading and seeing all  
4 over the internet and from the news. And then it started quickly growing, and that's  
5 basically what it was, was people coalescing together and -- and that's it.

6 Q All right. So let's then move on to the November 14th rally, the March -- I  
7 believe it was the first iteration of the March for Trump. Before we get into that, I want  
8 to go through a list of people. And these are people, they appear to have been crucial  
9 to planning, but just give us a brief summary of what their role was with you all with  
10 helping plan this rally in D.C., so --

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

[REDACTED] [REDACTED]

[REDACTED] Yeah, [REDACTED]

[REDACTED] Before we get away, is it okay for me to ask a couple of questions?

[REDACTED] Oh, please, please do.

BY [REDACTED]

Q Good morning, Ms. Kremer. My name is [REDACTED] I'm one of the  
investigative counsel on the Select Committee. I just have two follow-ups to answers  
that you gave to [REDACTED] a few minutes ago. One was just clarifying -- I think you used a  
phrase, and maybe it was just, you know, a figure of speech, but you mentioned in terms  
of your relationship with Ali Alexander, sort of the enemy you know is the better than the  
enemy that you don't. But I want to clarify whether you viewed him in an adversarial  
way before the 2020 election?

A Yes.

Q Okay. And why did you see him in that way?

A Because when Ali did not like somebody, he was very vicious in trying to take

1       them down, destroy them, go after their donors, that sort of thing that I had seen, you  
2       know, from the sidelines him do to other people, and I never wanted to be a target of his.

3               Q     So did you or Women for America First ever experience being the target of  
4       that kind of reaction from Mr. Alexander before the 2020 election?

5               A     No, not to say that there never was a disagreement or something like that,  
6       but nothing that was so significant.

7               Q     And then you mentioned being at an election night party on November 3rd,  
8       and the text messages seem to indicate that you may have been somewhere where there  
9       were members of a campaign.   What was the election night gathering that you were at?

10              A     It was just a celebration, a party.   I mean, we see almost every person that  
11       runs has an election night party.   And I was with Doug Collins' team and supporters at a  
12       hotel in north Georgia.

13              Q     So the campaign folks that you mention, or you refer to in the text message  
14       are members of the Trump campaign in Georgia?

15              A     No.   I said Doug Collins.   I didn't say anything about Trump.

16              Q     I'm -- that's -- I'm seeking that clarification.

17              A     Oh.

18              Q     So I understand that Doug Collins was -- was previously a Member of  
19       Congress.   Was it -- but I was not -- I know he's no longer at this point.   So my question  
20       to you is, whose campaign were you with in north Georgia on election night?

21              A     Doug Collins.

22              Q     Okay.   And in the reference to, they just took the kids into a room, is that in  
23       reference to children who were at the party or Mr. Collins' children, or what's that in  
24       reference to?

25              A     I don't know if I was speaking about the children of Doug Collins, or if I was

1 speaking about something that that I saw on TV regarding maybe someone else's children  
2 with a campaign, whether it was Trump's. I don't recall exactly who I was referring to.

3 Q And so this is the last -- I'm just, again, trying to get clarification on this. It  
4 looks like your mother says, what is the campaign saying, and you mentioned, they took  
5 the kids into a room. I don't think it's good.

6 In terms of your understanding, was that based on communications with people  
7 from Doug Collins' campaign in Georgia, or are you referring to contacts that you had  
8 with the Trump campaign more generally?

9 A I was referring to the Doug Collins campaign, I believe.

10 Q Okay. Thank you.

11 [REDACTED] Thanks, [REDACTED]

12 Any other questions?

13 BY [REDACTED]

14 Q All right. So going back to the November 14th rally, I'm going to list a series  
15 of folks that I believe were assisting with planning this rally, but it would be great if you  
16 could just provide us, like, a brief summary of their roles and what their responsibilities  
17 were in planning the November 14th rally in Washington, D.C.

18 So I'm going to start with your mother, Ms. Amy Kremer. What was her role  
19 officially in planning the rally?

20 A She was chairman of Women for America First, and Women for America First  
21 obtained the permit, and she oversaw pretty much the whole thing, building grassroots  
22 networks and, you know, kind of dialing, calling people, getting the message out on social  
23 media and bringing together a group of people to work in a coalition to get the word out  
24 because we were seeing tremendous censorship from big tech.

25 Q Mr. Dustin Stockton.

1           A     Again, I have known him through the grassroots network, and it was about  
2     getting the word out for people to get to D.C.

3           Q     So his role was just getting the word out. Did he have any, like, planning  
4     role or logistics role or anything?

5           A     No.

6           Q     Okay. Who is Jennifer Lawrence?

7           A     I mean, he could have --

8           Q     I'm sorry.

9           A     He could have -- he could have helped on numerous things, but there were a  
10    number of volunteers and people stepping in to help. We had a very short window of  
11    time to put this all together, so it was kind of all hands on deck. But in any official  
12    capacity, no.

13          Q     Ms. Jennifer Lawrence.

14          A     Same as Dustin. Jennifer is Dustin's fiancée or girlfriend.

15          Q     And you mentioned Ms. Hulse earlier as a board member, so what was her  
16    role with actually planning the event?

17          A     She was doing the same things that my mother and I were doing, connecting  
18    people, making logistics happen with hotels, sounds, staging, various different things we  
19    were all working on.

20          Q     And last, Ms. Cindy Chafian.

21          A     Cindy was more of like a head volunteer at that point. She had been with  
22    my mother and I in D.C. she lives somewhere right around in Virginia outside of D.C.,  
23    and she would come and volunteer for, like, the Amy Coney Barrett stuff that we were  
24    doing at the Supreme Court, and she kind of helped take on that role within the events  
25    for November 14th and December 12th. And because she had such close proximity to

1 Washington, D.C., she was helping with the permit process.

2 Q Got it. Speaking of Ms. Chafian, can you open up exhibit 31, please?

3 These are text messages, I believe, between you and Ms. Chafian?

4 A Is there any way that you guys can just put it on the screen? That's quicker.

5 Q Yeah.

6 A Okay.

7 Q Let's see. Let's do that.

8 A Thank you.

9 [REDACTED] Can we put exhibit 31, and then let's just go to the last page of  
10 the exhibit, so it will be 59 of 59 on the actual PDF. And for reference,  
11 it's -- KKremer3085 is the Bates ID. Okay. So that's perfect.

12

BY [REDACTED]

13 Q So it looks like right here, you said to Ms. Chafian that we need to be on  
14 Slack.

15 Did you all communicate on Slack when planning this rally in November?

16 A No.

17 Q Okay. Had you all previously been communicating on Slack? I guess I'm  
18 just trying to understand the reference to we need to be on Slack and why that came up?

19 A Yeah. From my understanding, Slack is a way that people can easily  
20 communicate on group messaging, and I have known that people can -- I guess it, from  
21 my understanding, is a better way to organize and then to be able to just keep things  
22 consolidated when you have multiple emails going back and forth and things like that, but  
23 I don't think we ever got on Slack. I don't have any recollection of that at all.

24 Q Okay. Thank you.

25 [REDACTED] We can remove the exhibit.

1

BY [REDACTED]

2

Q So explain to us how you all came to the decision of holding the rally in

3

Washington, D.C., on November 14th. How did that come about?

4

A That was the next date after the election that we felt like was reasonable to

5

get people to Washington, D.C. It was that -- a weekend, so people wouldn't have to

6

necessarily take off work, and it gave us enough time to secure a permit.

7

Q And whose idea -- if there was a person or a group of people within Women

8

for America First whose idea it was to have this rally on November 14th in D.C.?

9

A My mom's, Amy Kremer.

10

Q And what was the goal in holding this rally on November 14th?

11

A To let people know that they weren't alone in what they were feeling at

12

home. We had been reached out to numerous people from across the Nation of just

13

saying, how is this happening? What is going on? What do we do to make sure that

14

every legal ballot that was cast is counted and every illegal ballot that was cast is thrown

15

out?

16

Q Why was the decision made to have the rally in D.C. versus, like, at local

17

State capitols like you mentioned earlier that you would, you know, go to demonstrations

18

at the State capital? Why D.C. versus locally?

19

A Well, we had been doing them locally all across the Nation, focused on

20

various States, and we felt like there are people that may be not in those States

21

specifically, like Arizona or Georgia, Wisconsin, Pennsylvania that still felt like something

22

was going on, that they wanted to be heard, and they wanted elected officials to know

23

that we were going to hold them accountable and that we wanted a free and fair

24

election, and we just wanted information to be public. So you're much stronger when

25

you stand together, and that's a pretty powerful message. When you can bring together

1 that many people standing together, the elected officials cannot ignore you.

2 Q And you mentioned a few States just now that you said that there might  
3 have been some focus on. What States were you all focusing on during this time  
4 post-election?

5 A Well, specifically, I was in Georgia. But there was kind of a coalition effort  
6 of people in Arizona, Wisconsin, Michigan, Pennsylvania. Six or seven --

7 Q Was this coalition -- sorry.

8 A I'm sorry. There were six or seven States that it was focused on.  
9 However, there were other States that people were also doing things in. It wasn't just  
10 specifically limited to certain areas. And just because it was at a State capital in some  
11 areas doesn't mean that it wasn't -- that people, you know, an hour or 2 hours away  
12 weren't holding something locally as well.

13 Q And when you say people, are these Women for America First people, or  
14 maybe was it organizers from other organizations?

15 A I mean, it was grassroots activists all across the country. We don't -- at  
16 America -- Women for America First, we don't have, like, a specific membership.

17 Q Okay. Were you all -- I mean, I guess what I'm trying to figure out, was,  
18 like, Women for America First helping organize these demonstrations in the various  
19 States that you just listed?

20 A I wouldn't -- as far as, like, organization goes, I don't know specifically, you  
21 know. I wasn't trying to secure permits or anything like that, but connecting people that  
22 maybe have not been previously connected to figure out, you know, how to get involved,  
23 and these are people that we've worked with in the past. Some people were brand new  
24 to ever doing anything politically, political activism. So connecting them with local  
25 people, local leaders in their area, most -- mostly like that.



1           Q    So getting back to the November 14th rally in D.C., was it part of the original  
2   idea to hold this rally with Stop the Steal?

3           A    So the whole Stop the Steal that you're talking about, are you referring to  
4   the organization with Ali?

5           Q    That's what I'm referring to, yes.   And, please, if I'm referring to it wrongly,  
6   please let us know what -- how it's -- I guess the proper away to address his group and  
7   what your thoughts are on that.

8           A    I will.

9           So the Stop the Steal, like I said, I started the Facebook group.   I started that  
10   without direction of anybody other than a discussion that my mother and I had in person  
11   after I had gotten back from lunch the day after the election.   And there were a number  
12   of people, I want to say 30-plus people, maybe, that I spoke with that kind of came  
13   together in different organizations and whatnot to continue to get the message out.

14          Ali deemed himself that he was going to be in charge of everything, and basically  
15   took the Stop the Steal and decided I'm making this my thing and fine, who cares,  
16   whatever.   We're working in a broad coalition, not in any organization or capacity as,  
17   you know, moving towards that direction, and an actual organization was going to be  
18   made.   It was a broad coalition of influencers and big organizations that were just trying  
19   to get the word out, and trying to basically pool all of our resources together so that we  
20   could be stronger standing together in force.

21          So when you're talking about that, one of the very early-on issues that I had with  
22   Ali is that he was setting up to accept donations through his personal accounts, and I  
23   thought that that -- first of all, we wanted nothing to do with that.   Second of all, there  
24   needed to be transparency [inaudible] did not find issue with that.   And the reason that  
25   they didn't find issue with that was because they had never previously worked for

1 organizations and/or had built any organizations, weren't familiar with how the election  
2 process laws kind of worked. They're used to being social media influencers when  
3 they're getting directly paid, or maybe they have a company set up for themselves or  
4 something. So they saw no issue with what Ali was doing, and when I voiced that  
5 opinion, I was [inaudible] specific phone call that was had the day of my grandfather's  
6 memorial service where I addressed these issues with this group of influencers, and it did  
7 not go well whatsoever, and [inaudible] with him just about, you know, my mom -- we're  
8 all working on stuff, with getting the permits and the staging and the sound and all of  
9 that, but I likely will not have an update for everybody exactly how things are going to go  
10 because this memorial service, you know, was taking place and also, you know, it was a  
11 very emotional time.

12 So when I got on this phone call, and Ali is, like, so we need the update, we need  
13 the update, and he took it upon himself to have in the 2 or 3 days that I kind of was not as  
14 communicative, nor was my mother with everybody else pending the memorial service,  
15 to put himself in charge of everything and to tell everybody that we got the permit for  
16 Stop the Steal under his direction when none of that was true.

17 Q Was some of the folks, the influencers that you were just referencing, is it  
18 individuals like Mr. Brandon Straka? Is that one of the individuals that you're referring  
19 to?

20 A Yes, sir.

21 Q And so, thank you for explaining kind of that background with  
22 Mr. Alexander. I guess the question becomes why did you all continue to have the  
23 event with him even though there was some of this friction going on in the background?

24 A So there are various reasons. Number one, you know, we like to work in  
25 coalitions with people because we believe that we're stronger all standing together,

1 pooling all of our resources. Again, we're fighting the big tech censorship, so we needed  
2 as many people getting our messaging out as we could.

3 You know, I'm sure that there are many times that you work with someone that  
4 you may not like personally, but you put, you know, your -- you just do it. It's part of  
5 being an adult. So, again, it's kind of the devil that you know, that I know Ali is a shady  
6 character. I've been voicing my opinions about what I feel like is wrong with him trying  
7 to raise money personally with [inaudible] making sure that we were doing everything  
8 right by our organization because we obtained the permit. It was our idea, and we were  
9 going to move forward on that.

10 The reason that I -- we actually had a meeting, I believe the day before, the night  
11 before the event, and I sat this whole group down and basically told them I was so  
12 disgusted with the way that they were very disrespectful to me and my mom, numerous  
13 other people that were [inaudible] in our organization. It was people that were all  
14 trying to work together, and, you know, many of these people who I admired or thought  
15 highly of had really shown their true colors, that they're very much about themselves, and  
16 about making a dollar and basically grifting off the movement [inaudible] keep them  
17 looped in, is because it took all of us getting the messaging out to get all the people that  
18 came to D.C., and I only thought that it was the right and fair thing to do.

19 I set parameters that said specifically there will be no mentioning of the  
20 stopthesteal.US website, or about donations. I had an order that they were going to  
21 speak in. They had, you know, a very short time, each individually to speak, and Ali  
22 would be going last. And if one person -- I don't care if it was the very first person  
23 mentioned anything about stopthesteal.US or about donating to them, it would be ruined  
24 for the rest of the group of influencers. And I made that very, very clear to them, and  
25 they abided by that rule or my, I guess, parameter, to the best of my knowledge.

1           But it was very chaotic and a lot -- very stressful because I felt like I was, for lack of  
2 a better way of describing it, being bullied. Brandon Straka and I got into specifically a  
3 very heated argument on that call that we had had. And so he showed up to the event,  
4 and I wanted him removed, and Ali had his own security there that he was acting like a  
5 God, that they were holding onto his shoulders, like he was so important, he couldn't  
6 even stand up by himself. And so when Brandon Straka was, like, kind of in our green  
7 room area, tent thing, I wanted him removed, and Ali's people started making basically a  
8 scene. And it was, like, I wasn't going to get anywhere and that -- just move on.

9           But as far as that's why I still included them except for Brandon Straka because of  
10 the accusations and allegations that he made publicly about my mother and I on social  
11 media and had other social media influencers make those same accusations and was  
12 trying to create dissension between grassroots leaders across America regarding Women  
13 for America First, and I was not going to tolerate that.

14           But as far as the other influencers, some of these, you know, young kids, I guess  
15 how my mom says it, you know, people that are my age didn't really know nor care about  
16 the different intricacies about the different organizations and power plays and how much  
17 money really people were talking about with Ali raising because there was no  
18 transparency. They had no concept. And so they just were, like, well, I'm just here. I  
19 want my voice heard and, you know, my little minute on stage. So that's why it  
20 went -- happened like that.

21           Q   Thank you. Thank you for providing that context. I do -- I think you  
22 mentioned it, but I just want to zero in on it to make sure we're understanding it. I  
23 know that there was a disagreement with the term "Stop the Steal" with Mr. Alexander,  
24 and you said to him you wanted to go with a more positive message, I believe, was what  
25 you were telling him. What -- can you help us --

1           A     Right.

2           Q     -- understand how that came about and going with a positive message and  
3 just provide context for that conversation?

4           A     Right. Because big tech was censoring everybody using Stop the Steal, the  
5 hashtag, creating new groups on Facebook. Obviously, we saw it within our group, and  
6 we just felt like we needed to put a more positive spin on it because they kept saying,  
7 you're spreading election misinformation and inciting violence. So we said, that's  
8 certainly not what we're doing. Just because someone says that's what we're doing  
9 doesn't make it true. However, if we go with a different phrase, and people start  
10 coalescing around that phrase, it will be easier to get our messaging out. Sure, we can  
11 still kind of have that in the background if that's what everybody knows brought us all  
12 together, but that that is a way to be more positive and, hopefully, we could get around  
13 the censorship that we were seeing from big tech.

14          Q     So it wasn't -- this was, like, a strategic decision from Women for America  
15 First. You didn't receive this message from, like, the White House or the campaign or  
16 anything regarding Stop the Steal?

17          A     I mean, not specifically do I remember that. I know that I had this  
18 conversation with numerous people about what kind of the best phrasing going forward  
19 was, and if we really should avoid the Stop the Steal phrasing, or should we just continue  
20 using it and deal with the big censorship. I can't remember specifically who I had those  
21 conversations with, but I know it was an ongoing conversation with numerous people.

22          Q     Okay. Thank you.

23                So you also touched on this a little bit about, you know, generating interest for the  
24 event, and I've seen the term -- I don't know if it's your documents or just everything we  
25 looked at, crowd building efforts, or mobilization efforts. Describe to us how you guys

1 mobilized folks to want to come to D.C. for this rally. Were there specific methods or  
2 anything that you might have used?

3 A I wouldn't say that there was any specific methods. It was connecting  
4 people, maybe local people that wanted to drive up together, or just letting people know  
5 what different hotels people were staying in, if it was, you know, a single person coming  
6 by themselves, that they were staying around similar people that were going to be  
7 attending the same event. Just getting things out to different groups, I guess, you know,  
8 whether they were local GOP groups or Tea Party groups or moms' groups. Just letting  
9 people know and getting the word out that we were going to be meeting in D.C., and if  
10 they weren't able to make it in D.C., then they had the option to hold a local event,  
11 whatever they deemed was appropriate.

12 Q And by connecting these people, how were you connecting with them?  
13 Was it via social media? Was it through email blast? How were you connecting folks in  
14 the way you've just described?

15 A I think all of the above: email blasts, phone calls, text messages, social  
16 media, carrier pigeon. I'm just kidding.

17 Q So I believe you touched on Ali Alexander's group. Were there any other  
18 partners that you planned the rally with? Like, for example, would you consider  
19 Mr. Mike Lindell as a partner for organizing this event?

20 A Not for January -- I'm sorry. Not for November 14th.

21 Q Okay.

22 A He was someone that we had obviously been in contact with, but as far as  
23 planning, not specifically that I remember.

24 Q I think there was a -- and I can pull it up if needed, but I'll just reference it.  
25 There was a text message to him the day of the rally where you texted him, like, how

1       thankful, thank you for your efforts or -- let's just pull it up.   This way I'm not  
2       misphrasing you.   It's exhibit 12, and it's going to be doc ID 5463.

3               So you say, "I can't say thank you enough.   I'm truly grateful for you being a  
4       major part of making today successful."

5               How did Mr. Lindell make November --

6               Mr. Warrington.   Hey, [REDACTED]

7               [REDACTED]   Yes.

8               Mr. Warrington.   Sorry to interrupt, but the exhibit 12 in the Dropbox actually is  
9       a blank page for us.

10              [REDACTED]   It was a blank page?

11              Mr. Warrington.   Yeah.

12              [REDACTED]   Okay.   That might have been in the transition over.   This is it  
13       right here on the screen, and we can --

14              Mr. Warrington.   Yeah.   I can -- I can see it.   If you could just --

15              [REDACTED]   Okay.

16              Mr. Warrington.   You know, when you get a chance.

17              [REDACTED]   Yeah.   We'll send it over to you over one of the breaks.

18              Mr. Warrington.   Okay.

19              BY [REDACTED]

20              Q    So, again, it says, I can't say thank you enough.   This looks like it's a text to  
21       Mr. Lindell.   I guess we're just trying to figure out, what did he do to make the event  
22       successful?

23              A    I think at that point, he said this was [inaudible] -- so I'm confused.   The  
24       first one says -- like, at the top of that page, it says 11/19, and then it goes back to 11/14.

25              Q    Right.   Oh.   So it might -- or this -- maybe it looks like your text, though, is

1 on November 14th, and then his response to you looks like it's on November 19th.

2 A I mean, that just seems weird, the way that it is in succession there.

3 Q So if you don't remember, it's fine. I'm just trying to -- I'm just trying --

4 A I don't -- I mean, at some point --

5 [REDACTED] Excuse me. I think he's referring to -- just so you know, and  
6 [REDACTED], you can correct me if I'm wrong. From my understanding, the way that the text  
7 messages were produced to us was actually in, like, reverse chronological order.

8 [REDACTED] Reverse. Okay.

9 Ms. Kremer. Okay.

10 [REDACTED] Almost like if you were reading an old email chain.

11 Ms. Kremer. Okay.

12 [REDACTED] To read this PDF, you'd have to go all the way to the end to get to  
13 the earliest one and then read up. And so the very first page would be the most recent  
14 message.

15 [REDACTED] That's correct.

16 Ms. Kremer. Okay. That makes sense.

17 So on November 14th, that evening, well, Mike obviously spoke. He was very  
18 happy with seeing obviously the progression of how kind of we had gone from doing  
19 different events across the country to galvanizing that many people to get to D.C. And I  
20 believe that there had been conversations with him about launching a bus tour and for  
21 him being a part of it, but I can't remember specifically of what I was talking about.  
22 Obviously, he spoke at that event that day, and I spent a lot of time with him at the  
23 Supreme Court that afternoon, I believe, with our stage there.

24 [REDACTED] And we'll touch on the Supreme Court part of the program. You  
25 can actually take the exhibit down. Thank you.



1 [REDACTED] Actually -- I'm so sorry. While we're there, if you wouldn't mind  
2 putting the exhibit back up.

3 BY [REDACTED]

4 Q I think in that exhibit, Mr. Lindell says something to the effect of we can  
5 co-sponsor the whole thing. Was he a donor that contributed funds to any of your  
6 rallies?

7 Mr. Warrington. We're not going to get into, like, donors, but I think it's fair to  
8 ask about sponsorships.

9 [REDACTED] Oh. I'm sorry. Let me be clear about the term.

10 BY [REDACTED]

11 Q Was he somebody that gave you money to put on a rally?

12 A He was a co-sponsor of the bus tour. His logo for My Pillow was on the bus  
13 as well as the Lindell Recovery Network, along with several other entities.

14 Q And I guess what I'm asking is, did that co-sponsorship include providing  
15 funding?

16 A I'm not going to discuss anything about our funding or donors.

17 [REDACTED] Can you tell me what the basis of your objection for that is, and that's  
18 really a question for your attorney, not you.

19 Mr. Warrington. Yeah. The issue with regard to the donors, I mean, as you  
20 well know, the committee has made numerous statements publicly that they're talking  
21 about possible referring criminal indictments to the Department of Justice regarding  
22 fundraising surrounding these events. So you can ask about whether he sponsored and  
23 got his logos on the bus and stuff, but we're not -- we're not going to talk about who  
24 donated to what campaign for what activities.

25 [REDACTED] So, David, we have to be clear. Is what you saying is that the

1 witness -- and she would have to do this. Are you saying that she's exercising her Fifth  
2 amendment right?

3 Mr. Warrington. Yes.

4 [REDACTED] Like what -- okay. Okay.

5 Go ahead, [REDACTED]

6 [REDACTED] Thanks.

7 BY [REDACTED]

8 Q What about Mr. Alex Jones? Did he have any role in helping plan the  
9 November 14th rally?

10 A No. And that was actually something that I had seen, I guess, online,  
11 whether it was talk or articles. I don't know whether it was social media or maybe a  
12 news article that I read, but someone had mentioned to me something about Alex Jones  
13 being involved, and I said, absolutely not, because I have always viewed him as very fringe  
14 and extreme with his InfoWars stuff.

15 So I asked Ali if he was involved in any of this, and with -- and when I say involved  
16 in any of this, of conversations that were being had with these influencers, right, of  
17 getting the message out. Was there any communication, and Ali kept assuring me that  
18 no, he was not talking to Alex Jones. But, you know, obviously if he's getting stuff out  
19 on his InfoWars channel and whatever networks he has, like, that's great for us. We'll  
20 just reap the benefits from it.

21 So it was not until later that I found out that that was not true, and that Alex Jones  
22 actually supposedly paid money to Women for America First for the event and staging  
23 and to help out with it, which was untrue. We never received anything from any of  
24 them. Women for America First was the only one who paid for anything on November  
25 14th.

1           Q    So that's -- so Mr. Alexander's group didn't split some of the costs for  
2 November 14th?

3           A    No.

4           Q    Well, what about Mr. Steve Bannon, or War Room? Were they involved in  
5 planning the November rally?

6           A    Not specifically planning. Obviously, I think that Steve was talking about it  
7 on his War Room show. I don't remember the dates, if I was on War Room with him  
8 prior to November 14th, or if it was after, but I was on War Room with him numerous  
9 times throughout -- between, you know, Election Day and then January 6th. But as far  
10 as the planning goes, no.

11          Q    Was he -- I think you all had discussions about him possibly speaking,  
12 though. Do you recall any conversations with Ms. Alexandra Preate about the possibility  
13 of having Mr. Bannon speak at the rally?

14          A    I'm sure at some point, there was a conversation. We kind of have an  
15 open -- I shouldn't say an open invitation, but people with higher profile names, especially  
16 if they're helping get the word out with things, if they would like an opportunity to speak,  
17 we would certainly love to include more people. We're about bringing people together,  
18 and so I'm sure that at some point, there was a conversation that was had about that.

19          Q    But that's about the extent of the coordination that you had with  
20 Mr. Bannon or War Room. Is that fair?

21          A    Yeah.

22          Q    Okay.

23          A    Pretty much. At that point, they obviously came on at some point to help  
24 be a part of pushing out what we were doing with the bus tour, their logo was on the bus,  
25 and having me on continuously, giving updates from the road and continuing for the

1 other rallies.

2 Q So did you all coordinate at all with the White House or the Trump campaign  
3 for the November 14th rally?

4 A No. I don't believe so.

5 Q There are --

6 A I believe that -- I believe that at some point, either members of the campaign  
7 or -- were basically, like, notified that this was being planned just to give them a heads up.  
8 And, obviously, the same thing goes just of what I said with Bannon or other high-profile  
9 people. Obviously, we would love the President or any member of the family or  
10 any -- you know, someone higher up in leadership to join us.

11 Q So --

12 A But as far as planning anything, no.

13 Q Okay. So was it, like, more situational awareness type, just letting people  
14 know what was going on?

15 A Correct. But I can't remember any specifics of those conversations, but I'm  
16 sure that they were had.

17 Q Okay. I do have a couple questions with some specific references in the  
18 chain with your -- the text messages with your mom. This is exhibit 7. And can we go  
19 to page 5750?

20 [REDACTED] Yes. Give me one more second. I'm just pulling it. 5750.

21 [REDACTED] No worries. No worries.

22 BY [REDACTED]

23 Q So if you go to the top of that page, and you can zoom out a little bit so that  
24 we can see the entire page, but there's a -- it looks like a message from you at 2:51 p.m.  
25 where you say, "don't repeat that you text Mark."

1           Who is that in reference to?

2           A     I'm sure that that was Mark Meadows.

3           Q     Okay. And why were you -- I guess, help us. What were you telling your  
4 mother at this point, like, don't repeat to who that you text Mark?

5           A     Oh, right. Number one, I don't really like to let people know when I have,  
6 or my mom have direct contact with people that I guess are more higher profile, because  
7 then you can have plausible deniability about not reaching out to someone on someone's  
8 behalf if they are trying to get a message to them.

9           But, also, there were still a lot of people around, and if Mark didn't respond, I  
10 didn't want that to make my mom seem inferior or look bad, to be, like, oh, he's not  
11 responding to her. So I just thought that it was best to keep it private.

12          Q     Got it.

13          A     Not everybody needed to know what we were doing, you know, at the  
14 leadership of the organization, the level of leadership.

15          Q     I guess this is before I get to the next one. Can you just tell us just the  
16 nature of your relationship with Mr. Meadows? Like, how long have you known him?  
17 Do you all frequently communicate?

18          A     I don't know how long I've known him. Quite a while. I mean, he was a  
19 former Congressman. I don't know what else to say about that. Obviously, we worked  
20 on numerous projects throughout the years. I can't think of anything specifically, but  
21 we have, you know, a decent relationship with him. And, I mean, I guess that --

22          Q     Did you meet Mr. Meadows through your mother, or did you have, like, an  
23 independent relationship with meeting him?

24          A     No. I met him through my mother.

25          Q     Okay.

1 [REDACTED] Can we scroll to KKremer5749? I think it's just the page above.

2

BY [REDACTED]

3 Q And I believe you say, Ms. Kremer, because let them all think -- think it and  
4 they will be so jacked up thinking he's coming.

5 Are we referring -- who are we referring to here? Is this about President Trump  
6 possibly coming to the rally?

7 A Yes. I believe that the message to Meadows was seeing if there was any  
8 chance that he was going to be coming. So I was just saying, you know, to be  
9 enthusiastic, being, you know, what -- I can't remember what his response was  
10 specifically to my mom, but just, like, leaving it open-ended and not saying no, the  
11 President wasn't coming. But I believe that we knew prior to the event, obviously, that  
12 he was not going to be making it.

13 Q But your mom did have, to the best of your knowledge, some type of  
14 preliminary discussion with Mr. Meadows about that possibility of President Trump  
15 coming?

16 A I think that it was a text message, but you would have to ask her about that.

17 Q Completely understand. Completely understand.

18 And was part of that coordination about possibly getting President Trump to your  
19 stage at SCOTUS, or was it for the main stage at Freedom Plaza?

20 A I don't remember specifics.

21 [REDACTED] Okay. [REDACTED] I believe you had a couple of follow-up  
22 questions.

23 [REDACTED] Yeah, and apologies. These are from probably a few minutes ago, so  
24 if you don't remember.

25

BY [REDACTED]

1 Q Earlier, you said something, and I thought it was in reference to Women for  
2 America First, but correct me if I'm wrong. You said something to the effect that we  
3 don't have a specific membership. Can you clarify what you meant by that?

4 A We work with grassroots activists all across the country, and it's not like you  
5 have to sign up and say, I'm a member of Women for America First to be working on  
6 projects with people. It's just like a -- we don't have State chapters with local leaders  
7 and a hierarchy where it's, like, top down like that, if that makes sense.

8 Q No, no. It does. It's extremely helpful.

9 Do you have -- and this is just my lack of familiarity with the structure, but do you  
10 have members that, like, sign up through your site that are members of Women for  
11 America First so they receive, like, newsletters or emails. Like, are they members of  
12 Women for America First?

13 A Well, just because you sign up for our email list, I would not clarify that as a  
14 member. We have crazy people signing up for our email list every day, that try and then  
15 market us spam or reporters or different Congressional offices, both Republican and  
16 Democrat, so that you're -- or so that they're aware, I guess, of the things that we're  
17 doing and planning. So just signing up for our email list does not necessarily equate to  
18 being a member. That's all I'm saying.

19 Q So when --

20 Mr. Warrington. [REDACTED] not to interrupt, but maybe just trying to be helpful  
21 here. Women for America First is your traditional sort of social welfare organization and  
22 in the context of membership because that does get to be a confusing concept when  
23 people aren't familiar with what a social welfare organization is or does. I don't know if  
24 that helps at all.

25 [REDACTED] No, no. It does. I was literally just trying to see because some of

1       them have, like, a membership structure --

2               Mr. Warrington.   Right.

3       [REDACTED] -- and some of them don't.

4               BY [REDACTED]

5               Q     So what I -- when you said, we don't have a specific membership, I was  
6     trying -- to Dave's point, I was trying to figure out.   So you do not have members?

7               A     Correct.

8               Q     Okay.   That -- and I wasn't trying to make that more complicated.   I  
9     appreciate Dave kind of boiling it down.

10              And then, earlier, I know we asked about the Slack, but I didn't understand your  
11     answer.   You did or did not use Slack to discuss planning the rally -- the rallies, excuse  
12     me?

13              A     Did not.

14              Q     Okay.   Gotcha.   And then, earlier, you said something, and I thought it was  
15     in reference to Ali Alexander, but again, I may be wrong.   You used the term gifting off  
16     the movement, and I just was curious who you were referencing to and what you meant  
17     by that?

18              A     Well, that term can be applied to a lot of people that I've come across the  
19     last couple of years, but specifically since November.   But I would think I was talking  
20     specifically about Ali with that.   He was essentially lining his own pockets, and because  
21     he was willing to throw, you know, money for a plane ticket, or for sound or stage at  
22     these local events that were happening across the country, people thought, Oh, this is  
23     great, this is great.   And while that is great, when there's a lot more funding that's  
24     coming in into his personal coffers, you know, there needs to be more of that being put  
25     back into the movement.   There needs to be transparency.   This isn't a get-rich-quick



1       scheme that I felt that it was becoming for Ali, because you had no idea what was  
2       being -- no one had any idea. I mean, he could say I've only gotten \$500, and how  
3       would I prove that any differently? And he --

4               Q     Go ahead.

5               A     He could have gotten a lot more than that, and I mean, where was the  
6       transparency and accountability of how that money was spent? And I just felt very  
7       uncomfortable with it.

1

2 [11:06 a.m.]

3

BY [REDACTED]

4

Q And so I just want to make clear -- and tell me if this is a -- I don't want to put words into your mouth, but the impression I got from you was that he may have been raising money for an event, but what he was actually spending towards that event might have been a fraction of what he raised when he said, "Hey, I'm raising money for this event," and then he may have spent a very small fraction of that on the actual event?

9

A I mean, anything's possible, but there was no legal entity that he was raising money through for an organization. Again, it was not a "Stop the Steal" organization at this point; it was a coalition of people that had come together to get the word out. So I have no idea anything about the funding because I had no access to any of it. There was no accountability and transparency. And when you went to StoptheSteal.us, I believe that that was the website, it talked about how to get money to "Stop the Steal," to further efforts across the country for, you know, various events. And there was no accountability for that.

17

Q And let me be clear: I do not expect you to know the finances of anyone else, so, please, if it sounds like my question is asking that, I'm definitely not asking you to definitively say that. I was just trying to get an understanding of when you said you thought that he might have been gifting off the movement, what I thought you meant was, he may have been saying he was raising all this money for an event and then not actually spending that money on the event. Is that fair?

23

A Yes.

24

Q Okay.

25

A And I think specifically how that relates to us is from all of our events that

1 we held, I was told by numerous people that he had said that he had paid for sound and  
2 stage and plane tickets and all these different things and hotel stays, and it was not for  
3 any member of Women for America First or any of our events.

4 So it was -- I mean, just -- it was flat out lying. So he was lying about what he was  
5 spending money on to those people. I'm sure that there was lying going on all across  
6 the board about what actually were the situation financially with the, quote/unquote,  
7 "Stop the Steal," as he was calling it.

8 [REDACTED] Got it. Thank you. That's super helpful context. And I apologize  
9 for going back so far in time. I'll try not to make it a memory test, but I hate to interrupt

10 [REDACTED] Thanks.

11 Go ahead, [REDACTED]

12 [REDACTED] No worries at all.

13 BY [REDACTED]

14 Q I think, along the same lines, is there anyone else that you considered a  
15 grifter that you worked with? I know we've heard a Mr. Alexander, Mr. Straka. Was  
16 there anyone else you felt this way about that you all were working with along this time?

17 A I mean, I'm sure that there were people, but I don't know specifically --

18 Q Okay.

19 A -- off the top of my head.

20 Q I just wanted to know if there were any of note that we could track. That's  
21 all, but if not, it's fine.

22 Let's go back to coordinating for November 14th. Did you coordinate with any  
23 Congressional Members when planning the event?

24 A Planning the event specifically, I don't believe so, but, again, an open  
25 invitation working with our staffs trying to get them to come kind of that area. Does

1       that answer your question?

2               Q     Yes.    So, like, open invitation to come speak was more of what you all were  
3       communicating with staffs about?

4               A     Probably about that.   Pushing it out through their social media network or  
5       helping to get the word out, but as far as the logistics of our actual event, I don't recollect  
6       any specifics with any staff of actually planning the event.

7               Q     So, when you were talking, for example, to Congresswoman Marjorie Taylor  
8       Greene, that was more so about speaking or pushing the event.   Is that a fair  
9       characterization --

10              A     I think so.   I think about kind of what the congressional schedule was  
11      around that time.   You know, this all kind of gets confusing because there were three big  
12      events, so remembering the specific event and the conversations that were had leading  
13      up to that, there was a lot going on all the time.   So --

14              Q     I completely understand that.   And so, yeah, if you just -- to the best of  
15      your recollection and it looks like you also might have coordinated along the same lines  
16      with Congresswoman Gohmert.   Is that right?

17              A     Yes.   Well, as far as coordination, again, getting the word out, speaking,  
18      what time they were, you know, going to be there, what was kind of going on on the Hill,  
19      what they were hearing, that sort of thing.

20              Q     And then another example of maybe pushing the word out or speaking  
21      would have been Congressman Kelly, but I think you were doing this more so through Ms.  
22      Rose Tennent.   Is that correct?

23              A     I really don't remember how Congressman Kelly got involved.

24              Q     Okay.   Did you discuss messaging at all with any of these Congressional  
25      Members, like the messaging for the rally or points to advocate for during the rally?

1           A    I mean, I don't recollect, I guess, either way specifically. Obviously,  
2   conversations were had, but I don't know about specific messaging or if it was just overall  
3   talking about what was the dynamic of everything that we were seeing and watching.

4           Q    So the November 14th rally is held at Freedom Plaza, but there was a second  
5   location; I've heard you mention it as SCOTUS. Help us understand the dynamic  
6   between the event at Freedom Plaza and then the event at SCOTUS?

7           A    The main event, I guess you could say, was at Freedom Plaza where it  
8   started, and then we marched down to the Supreme Court. I think that that had a lot to  
9   do with, number one, we thought that there was a possibility of the Supreme Court, all of  
10   the election stuff ending up in the Supreme Court. And then also the different  
11   schedules -- I can't remember specifics on what was going on in Congress that day, but I  
12   think new Members -- I can't really remember specifically.

13            Maybe there was an orientation going on that day or something, and so they  
14   weren't going to be able to be at Freedom Plaza, but still have them give an opportunity  
15   for them to be a part of the events. So, you know, obviously carrying an event for that  
16   long at one location is a lot more difficult than having it spread out for two different  
17   locations where people can walk to. Again, and I think that it was kind of the consensus  
18   that that was a natural fit to move to the Supreme Court because there were a lot of  
19   reports and things in the news and on social media that were indicating that it was likely  
20   to end up in the Supreme Court regarding the election.

21           Q    Did you have to coordinate, I guess, the marching aspect of the program  
22   with Metropolitan Police Department? Did you do that for this event?

23           A    I didn't specifically. Cindy was in charge of the permitting process, so I'm  
24   sure that she did specifically coordinate with them. I know we did have a permit to  
25   march.

1           Q    And what was the set up at the Supreme Court? We've seen the Freedom  
2 Plaza stuff. That -- that's on -- that's publicly reported, but what was the set up at the  
3 Supreme Court compared to the Freedom Plaza set up?

4           A    It was a much smaller scale. You can't have, at least to my knowledge, you  
5 can't have a permit at the Supreme Court. So it was basically on a  
6 first-come/first-served basis. We had a very tiny stage and sound system, and it just was  
7 like a very informal, kind of impromptu, I guess, best way to put it because there could be  
8 no real logistics of getting anything together and planning it and having a permit for it.

9           Q    And, I guess, who -- do you recall who spoke at the Supreme Court for this  
10 rally?

11          A    There were a lot of people. I do not recall specifically because there were  
12 two times at the Supreme Court, November 14th -- yeah.

13          Q    Right. The December and the November. For the November one,  
14 though, you mentioned Members being possibly like in orientation. I know you don't  
15 recall exactly what was going on, but did individuals like Congresswoman Boebert or  
16 Congresswoman Mary Miller or Congressman Bob Good, Congressman Madison  
17 Cawthorn, do those names all ring a bell as being speakers at SCOTUS?

18          A    Yes, they do.

19          Q    And you all were able to get them to speak kind of like through the process  
20 you just described as just getting the word out to staffs and coordinating with them to  
21 come speak. Is that how this came about?

22          A    Yes, to the best of my recollection.

23          Q    Okay. So just going back --

24          A    I think -- I would like to clarify something on that. I think that some of  
25 those Congressional Members may have just like walked over and said, "I'm a new

1 member," and then we included them in it. So I don't know that there necessarily was  
2 communications with all of their staff if that makes sense.

3 Q That makes complete sense. That does. It's kind of word of mouth: You  
4 see an event going on; you might go over there.

5 A Right.

6 Q So that makes complete sense.

7 [REDACTED] it looks like you might have a few follow-up questions.

8 BY [REDACTED]

9 Q Yeah, just one. I think you -- if I understood you correctly, you explained  
10 that Ms. Chafian was responsible for permitting. Is that right?

11 A I wouldn't say -- well, I guess responsible, but she was the one that was  
12 directed to handle all of that and to be on all the calls and --

13 Q So were you specifically aware of a march permit issued by the Washington  
14 Metropolitan Police Department, or are you assuming that there was a permit?

15 A I believe that there was a permit. I would have to go back and look to see  
16 specifically, but I do remember that Cindy said there was a specific permit to march.

17 Q So, if the Metropolitan Police had denied a permit application for the  
18 November 14th march, is that something that you recall being communicated to you?

19 A No.

20 [REDACTED] Okay.

21 BY [REDACTED]

22 Q So, going back to the event -- I know this is probably a very difficult question,  
23 but just ballpark it for us: Approximately how many people do you think came to the  
24 November 14th rally?

25 A I have no idea.

1 Q No idea. Okay.

2 A I mean, a lot of people.

3 Q A thousand people? 10,000 people? Just -- just so we can --

4 A Several hundred thousand.

5 Q Okay. Do you recall any, like, incidents, like, I guess like security incidents  
6 or anything occurring during this rally?

7 A At our event, no.

8 Q You said "at our event," what about just in the city that might have  
9 happened after the events? Not affiliated -- I'm not saying it's attributed to your event  
10 or anything, but just do you recall anything happening that weekend of note  
11 securitywise?

12 A I don't know if it was specifically November 14th or December 12th, but I do  
13 remember that there were issues with BLM and Antifa attacking, quote/unquote, MAGA  
14 supporters in D.C. that weekend. I believe that, for November 14th, I believe it was,  
15 like, kind of that evening people at restaurants and walking in and out of their hotels, but  
16 nothing during the day time that I recall.

17 And I remember that the media specifically tried to paint it as it was violent with  
18 BLM and Antifa because of our event. And our event had already wrapped significantly  
19 before that.

20 Q And I believe the President drove by this event. Do you recall that?

21 A He did. Before the event started, he was -- had his motorcade do a couple  
22 laps, I think, around Freedom Plaza.

23 Q Did you all have anything to do -- by "you all," I mean, Women for America  
24 First, have anything to do with coordinating this appearance by President Trump?

25 A I don't remember specifics of it, but, again, the open invitation and that he



1 was going to, you know, I guess, do his best or let people know that he was watching and  
2 saw them, but I can't remember specifics.

3 [REDACTED] So just -- just so that you can game plan, I want to talk about the  
4 Atlanta protest afterwards that I believe Mr. Alexander led that you all, I don't believe,  
5 had any coordination with, and then we can go on a quick comfort break. I know we've  
6 been going for --

7 Ms. Kremer. Okay. Actually, my computer just said "low battery." So I guess  
8 my computer is not charging.

9 [REDACTED] Okay. So we can go ahead and take a comfort break now. So  
10 let's do that and you want to come back on at 11:30?

11 Ms. Kremer. Okay.

12 [REDACTED] That's a good time to fix the charging issue.

13 Ms. Kremer. Yes.

14 [REDACTED] We'll see you all back at 11:30.

15 Ms. Kremer. All right. Thank you.

16 [REDACTED] No problem.

17 [Recess.]

18 BY [REDACTED]

19 Q Back on the record at 11:32.

20 I want to move on past the November rally. I believe it was like a  
21 November 20th rally in Atlanta. Women for America First did not participate in the rally  
22 at the capitol in Atlanta on November 20th, right?

23 A Not to my recollection. I think that this is probably the one that you're  
24 referring to that we were going to hold something, and then we decided not to hold  
25 something.

1 Q I believe it was because you all couldn't obtain a permit in enough time?

2 A Right. And we were getting a lot of pushback from the local -- I don't know  
3 how to put it, but like the permitting people, I guess, about wanting us to hold an event  
4 and with law enforcement, it was just -- we were getting a lot of pushback from them that  
5 it was not an easy process. So we decided not to do that also.

6 Ali was saying some just kind of rhetoric that we did not like and agree with, so we  
7 wanted to make it very clear that we were not working with him. And I believe that that  
8 was also when a guy -- I want to say his name is Chris -- he's with 1AP and I were on a  
9 public -- there was a discourse that happened that was pretty negative via social media.

10 Q Just to break that down.

11 So Mr. Alexander, to your understanding, led that rally. Is that correct? I  
12 believe it was Mr. Alexander and his group of folks?

13 A I think it was him and Alex Jones. Was Alex Jones not there? Yeah.  
14 Where they went inside the capitol and were --

15 Q Yep. Perfect. What do you recall about them entering the capitol?  
16 We've seen reporting, but what do you recall about that specific incident?

17 A I mean, just watching how it all played out and -- you know, first and  
18 foremost, there are rules and regulations, laws, whatever in place for a reason. You  
19 can't just do whatever you want whenever you want. So the fact that they were  
20 continuing on, even though, you know, the local jurisdiction there did not want them  
21 there, was not making it easy, that they didn't find an alternative place to be, and then  
22 just very disruptive, and that's not how you get your voice heard to be that disruptive and  
23 that in your face about something.

24 Q And what was the rhetoric that Mr. Alexander was using that made you all  
25 feel uncomfortable or disagree with?

1           A    I can't recall things specifically. He was doing a lot of periscoping and live  
2 videos, and I don't know if it was tweeting at that point. I don't remember the timeline  
3 of when he was kicked off social media, but, again, Alex Jones was with him, and he says a  
4 lot of crazy fringe outlandish things on his InfoWars channel.

5           So we just did not want to be wrapped up in that with him.

6           Q    And that's why you all put out a statement -- I believe, Women for America  
7 First put out a statement after that rally was because you disagreed with the way it was  
8 organized. Is this a fair characterization?

9           A    It's not -- yes, organization, but not solely that. I mean, some of the things  
10 that they were saying -- and, again, I can't remember specifics, but just, you know, like  
11 getting in peoples' faces, just very aggressive in their demeanor and their tone.

12           Again, I talked about it from the November 14th rally too about how Ali had a  
13 group of people around him that were his, quote/unquote, security that surrounded him  
14 in a circle, holding his shoulders like he was some sort of god.

15           And it gave the impression that not only was it a dangerous situation that  
16 someone would need to be protected like that, but that also that he was not a grassroots  
17 activist, and it came across as very disingenuous and that there were ulterior motives to  
18 think so highly of himself like that if that makes sense.

19           Q    And I forgot to -- you mentioned the disagreements with the 1st  
20 Amendment Praetorians. I think you said his name was Chris. You just -- briefly, what  
21 was that about? Was it about the actual messaging or what was that disagreement  
22 about?

23           A    I can't remember specifically how it started and what the dialogue was, but  
24 essentially what happened was Cindy -- I believe it was Cindy -- I'm sorry. I'm trying to  
25 recollect.

1           Q    No worries.

2           A    I don't remember exactly how we got connected with 1AP, but they were  
3 explained to us by whoever -- and, again, I can't really recollect of how this all came to be  
4 about -- but to help with security, obviously in an unofficial, you know, unarmed capacity  
5 there in D.C. to be volunteers and that they were mostly veterans that were, you know,  
6 supportive of our cause and everything.

7           And, at one point, there was just this severe breakdown prior to the  
8 November 14th rally because they were heavily working, unbeknownst to us, with Ali.  
9 And so, when I found that out, I just had a lot of distrust with them, and part of that event  
10 on the 14th was me asking some of them to remove Brandon Straka, and they refused.

11           And I felt very uncomfortable and that the situation could have gotten quickly out  
12 of control if we had them really involved with anything moving forward. So, when I  
13 found out that 1AP was going to be there in Georgia or in Atlanta -- I believe you said the  
14 date was November 20th for that event -- that was even more so of why -- I mean, sure,  
15 you guys can be veterans, and thank you for your service, and that's wonderful, but you  
16 also have to be, you know, in coordination with local law enforcement in respecting law  
17 and the rules and boundaries that they set. And I just do not feel like specifically the  
18 leadership of 1AP really abided by that.

19           It seemed -- it just seemed uncomfortable and like something was amiss there.

20           Q    And you also -- we saw in text messages where you mentioned that Mr.  
21 Alexander at this rally in Atlanta was causing ruckus with the Proud Boys and Alex Jones,  
22 but getting back, like, specifically to the Proud Boys, what was your impression of the  
23 Proud Boys, and did you know that Mr. Alexander was actually working with them?

24           A    I mean, I'm sure that he was working with them. I can't specifically tell you  
25 that I know that, but, again, just working to get people of grassroots, I'm sure that

1 someone reached out to him from that organization. I don't know if it's really an official  
2 organization, but from that group. And just the things and the rhetoric that is reported  
3 social media-wise and in news reports -- I mean, you take some things with a grain of salt,  
4 but other things, you know, it just -- they've been painted as very much a fringe group.

5 I don't really know any of them specifically. I can't recall ever meeting anyone  
6 specifically that I knew that that's maybe who they were, but we just wanted to make it  
7 very clear that there was a distinction between, I guess, with some sort of fringe-type  
8 people within the conservative movement just as there are fringe-type people, you know,  
9 on the left.

10 And I felt and so did my mom and Jennifer that we take every opportunity that we  
11 can to make sure that there are clear distinctions, you know, with those groups.

12 Q So, to be fair, just to make sure I'm capturing this -- thank you for  
13 that -- Women for America First never coordinated or partnered with the Proud Boys or  
14 anything for any of your events, right?

15 A Certainly not to my knowledge, but, again, if I was speaking to someone  
16 or -- I can only speak for myself, but if I was speaking to someone that was a member of  
17 the Proud Boys, I never was aware of that.

18 Q Got it. No. And just asking just to make sure we're clear kind of on how  
19 you all organized versus maybe how some other groups might organize. So that's the  
20 basis for me asking that.

21 A Right.

22 Q And so around this Atlanta rally was November 20th, we now it seems  
23 looking through your messages and before I get there, I think [REDACTED] might have a  
24 follow up.

25 [REDACTED] Yeah. I just want to clarify. You mentioned with respect to

1 potentially doing something in Georgia and ultimately not doing something in Georgia,  
2 receiving pushback from law enforcement. Could you clarify what you mean by that?

3 Ms. Kremer. Well, like I said, I don't know specifically that it was law  
4 enforcement. I don't know the proper characterization to say the people in charge of  
5 the permitting process. I believe that it's law enforcement, and, again, it's different in  
6 various States and, you know, more of a localized thing, but I remember that we had  
7 reached out to some of the State house members to try and get their help, and they tried  
8 to help secure a permit possibly. And it was just kind of like a round and round circle  
9 that clearly they were making the process more difficult. I don't know whether that was  
10 because they felt it was unsafe or because they just didn't want us there or whatever the  
11 reason.

12 Maybe it was too short of time. I can't remember the specifics on what the  
13 pushback was initially, but then, at some point, you know, when Ali and Alex Jones and  
14 some other people continued down this path, you know, it was very clear that we needed  
15 to make the distinction.

16 I believe that we put out a public tweet or a statement about it. I don't  
17 know -- do you guys have that that you are able to show me to maybe help jog my  
18 memory?

19 [REDACTED] We don't have that included as one of the exhibits, but I am  
20 familiar with the statement that Women for America First put out.

21 Ms. Kremer. Okay. So then that would be maybe could help your -- the  
22 question that you're specifically asking to reference that of the specifics. Because like I  
23 said, there was a lot going on during all of this time that I can't remember specifically  
24 what all of that was?

25 [REDACTED] Thanks. I just wanted to clarify that, when you were talking

1 about -- and you answered the question, the pushback was in reference to whatever the,  
2 you know, agency or whoever it was, the authority that you were seeking or in  
3 conversation about having a permit, the pushback was in terms of trying to, you know --

4 Ms. Kremer. Secure the permit.

5 [REDACTED] Okay.

6 Ms. Kremer. And, you know, I think that that is a very clear distinction that, sure,  
7 there are times and places where you don't necessarily seek a permit. You know, it's  
8 more of an impromptu gathering of people. There's not a permit that's needed.  
9 Something like that, but obviously there are rules and regulations that are put in place to  
10 keep people safe, to let law enforcement know what's going on.

11 Obviously, we have seen agitation from BLM and Antifa over the last couple, you  
12 know, years now and never wanted anybody to be in danger or to create some sort of  
13 situation where it could possibly go in that direction.

14 And, especially in Atlanta, we saw that a lot on the news with agitating groups and  
15 that sort of thing.

16 [REDACTED] Got it. Thank you for that clarification.

17 BY [REDACTED]

18 Q Thanks. So it looks like, right after this November 20th Atlanta capitol  
19 demonstration, you all as Women for America First start to shift now towards the bus  
20 tour that took place from November 29th through December 12th.

21 How did the idea for the bus tour originate? I know Women for America First,  
22 you're grassroots, so you've done bus tours in the past, but tell us how it came about this  
23 instance?

24 A Yeah. Well, my mother's former chairman of Tea Party Express, and I also  
25 worked for Tea Party Express. And, you know, my mom is a great grassroots builder, but

1 if anybody knows how to do a bus tour, my mom is probably the best. And I'm not just  
2 saying that because she's my mother. She has had tremendous success over the years  
3 of doing bus tours, and she has always been itching to get back to doing that, which I  
4 think is crazy because it's a lot of stress, high-tense situations, and, you know, constantly  
5 traveling in and out of different hotels every night. It's a lot.

6 But she wanted to do a bus tour. Prior to that, I want to say early -- well,  
7 throughout 2019/2020, there was talk of doing a bus tour regarding the election, and  
8 then when COVID hit, obviously that changed the dynamic of everything. So we had to  
9 completely put that on hold. And there were a lot of people that wanted to go to D.C.  
10 on November 14th that were unable to, whether financially they couldn't afford it,  
11 logistically it just didn't make sense, or, you know, they had responsibilities at home that  
12 they couldn't get childcare or what not.

13 So we wanted to make sure that those people did not feel left out, and that just  
14 because they weren't able to be a part of something that that -- that massive that they  
15 didn't feel like they were alone and that their voice wasn't being heard. It's also a great  
16 way to create a narrative that the media will report on because it's something tangible  
17 that they can see. You know, a bus going across the country is obviously something very  
18 tangible. And we wanted our supporters to know that as well, that we were kind of  
19 taking a little piece of their messaging all across the country and we were kind of this  
20 thread that was pulling together people on our side and across the Nation.

21 Q And so you talk about traveling on the bus tour around the country,  
22 especially for folks who might not have been able to attend. You also talk about the  
23 stressors, which believe me, the message is illustrated, the kind that stresses the bus  
24 tour, but what was the messaging that Women for America First was trying to convey as  
25 you were going State to State on a bus tour?



1           A    I believe our slogan was "March for Trump to Demand Transparency and  
2   Election Integrity." That was on the side of the bus and that was basically what it was  
3   talking about was, number one, what was going on in your city, State, local municipality  
4   with the election. Also, to talk about how not to get in a situation, again. You need to  
5   sign up to be a poll watcher to go through the correct process to be able to count votes,  
6   different things like that.

7           How to step up and start getting involved in politics if you've never been involved.  
8   Encouraging people that you have to start somewhere. Maybe you should start at the  
9   school board, which ironically, you know, we've seen how that's all played out that  
10   people are making significant changes on a local level, and that's where you can see the  
11   most change happen, first and foremost, quickly, but also where you can actually have  
12   the biggest impact; that just because, you know, you're not a United States Senator or  
13   Congressman doesn't mean that you can't have a powerful impact on your community  
14   and have your voice really heard.

15          Q    When planning this bus tour, did you coordinate any of the planning with the  
16   White House or the Trump campaign? Were they involved at all?

17          A    Not to my recollection.

18          Q    If you did -- so, for example, I saw a few texts -- and this isn't like a gotcha,  
19   just trying to understand -- where you mentioned to your mom the text, for example,  
20   Ivanka or Kellyanne or Karen Pence, was that about speaking or getting the word out?

21          A    It would be in the same, that same kind of line with the other events. If  
22   they were either going to be in the local area or maybe there was someone that we  
23   needed to connect with in that area that had been a great grassroots activist to help  
24   bring, you know, attention and get the word out.

25          So I'm sure that there were conversations and people that were reached out to,

1       whether it were in an official capacity or someone that we had known along the way  
2       working either as a volunteer or at one time in capacity with the Trump campaign, but  
3       just basically as far as like grassroots networking and, you know, not to beat a dead horse,  
4       but the whole thing about Big Tech censorship and getting the word out.

5               Q     And one of the messages that stood out to me, at least, looked like with  
6       Senator Blackburn.   Looked like you all might have drafted, like, talking points for her.  
7       Do you recall that or like a message that she was going to blast out?   Was this part of  
8       that getting the word out?

9               A     I think that that actually maybe -- if I remember correctly that that was  
10      actually November 14th that she wanted to come -- it may have been December 12th,  
11      actually.

12              Q     Oh, okay.

13              A     December 12th.   We put a message up on the jumbotrons that she  
14      recorded because she couldn't be there.   And I don't know if that was because she  
15      wasn't in D.C. or because of, you know, obviously as a United States Senator, you have a  
16      job to do.   I can't remember the specifics of that, but I think that that's what --

17              Q     That's fair.   I think -- let's see -- can we pull up -- it's exhibit 7, so it's the  
18      message with your mother.   And then the number is 5668.   And this is the message, I  
19      think, that you all were drafting -- just to provide some color for us, just so we understand  
20      exactly what was going on.   Was this kind of like a --

21              A     Can you zoom in?   I'm sorry.   I didn't mean to interrupt.

22              Q     So is this to do a blast promoting the bus tour and December 12th.   Is that  
23      fair to characterize?

24              A     I think that maybe this was -- yeah.   I'm wondering if this was --

25              Q     Possibly for like your Tennessee stop?

1           A    Yeah. I mean, I don't remember specifically. There were so many stops  
2           and so many different events. Obviously, it talks about a specific location in Franklin,  
3           Tennessee, and then December 12th. To the best of my knowledge, obviously, I  
4           remember a video being played on December 12th. I don't remember what this maybe  
5           was used in something else for. I don't remember if we maybe included a video and an  
6           email that was blasted out. I can't remember specifics.

7           Q    Okay.

8           A    But something along those lines that she wanted, you know, specific bullet  
9           points or a, quote/unquote, script of the specific details of where to be when that sort of  
10          thing of how to get more information.

11          Q    And just so we're clear -- and I think I know because you've said it -- Senator  
12          Blackburn, this was one of those things where you were reaching out to her about  
13          possibly speaking or getting this message out, but you weren't necessarily like planning  
14          the bus tour with her or her office. Is that correct?

15          A    No. That is correct.

16          Q    Okay. Thank you. We can put the exhibit down, and, look, I understand  
17          also we're going back through your messages and it's now January of 2022. So, if you  
18          don't recall exactly what event it was for, there is no issue with that. We're just asking  
19          the question and appreciate you providing the context.

20                So I believe there were -- I characterize it as partners, but it looks like there were  
21          people or organizations that were helping sponsor the bus tour. And so I'm going to go  
22          through just a few of those so I understand their coordination with you. The first one  
23          was Mike Lindell.

24                Just explain to us -- you mentioned earlier to how Mike Lindell and his  
25          organizations might have assisted with the bus tour?

1           A     Well, obviously, everybody loves the My Pillow guy, you know.   Everybody  
2     knows him on TV.   They've obviously made fun of him on SNL and that sort of thing, but  
3     he is a great, you know, person, both personally, and the work that he does across  
4     the country through the Lindell Recovery Network has an incredible personal testimony  
5     and story of how he has gotten to where he is in life, and he was helping us get the word  
6     out, turn people out, people wanted to see him, shed light on what we were working on  
7     and that sort of thing.

8           Q     And part of that was maybe a sponsorship and a sponsorship with the logo  
9     on the bus?

10          A     Yes.

11          Q     Okay.   Did he assist at all with, like, developing a message that you all had  
12     on the bus so you were kind of with the theme?   Was he part of that, or was it more so  
13     Women for America First telling Mr. Lindell, "Hey, this is the message that we want to  
14     promote on the bus tour"?

15          A     It was more so us drafting a message, and I'm sure at some point things  
16     were, quote/unquote, run past him, you know, to say, like, "What are your thoughts on  
17     this," but nothing ever in an official capacity that he was responsible for of our messaging,  
18     to my recollection.

19          Q     Got it.   And then, similarly, War Room, Mr. Steve Bannon, it looked like  
20     they were also a sponsor for the bus tour.   Is that correct?

21          A     Correct.

22          Q     Was there anything else in terms of the relationship whether it be recording  
23     message or planning stops that involves War Room or Mr. Bannon?

24          A     You know, like I said, I was on numerous times on his show and just helping  
25     continue to get the word out, how people can get more information, where they can go

1 to see local events possibly in our area, and then just keeping people updated on what we  
2 were doing, I guess, in conjunction with whatever else he was reporting on during the  
3 election and kind of just how those fit together.

4 Q Is that part of the reason, I believe, I saw a message for a Mr. Luke Livingston  
5 might have come and covered the tour? Is that part of that promotion of the bus tour?  
6 Do you recall that?

7 A I remember that a little bit about him being offered to -- not offered, but like  
8 connecting us with him at one point, but I don't believe that we ever did.

9 Q Okay. Okay. And were there any other, I would say, like  
10 sponsorship-type partners that you've all worked with for the bus tour that I might not  
11 have mentioned?

12 A I can't remember all the ones that were on the bus. Liberty Lab obviously  
13 was on the bus and that is a company that we've worked with for many, many years, and  
14 they do all of our -- kind of anything tech related.

15 Q That's with Mr. Graves. Is that correct?

16 A Yes. That is correct.

17 Q And so, just to confirm the dates I said earlier, just to make sure I'm clear:  
18 The tour started on November 29th of 2020, and, I guess, the conclusion -- I have it in my  
19 head as the first part of the tour because I know you guys went on another one after, but  
20 it's December 12th in D.C. was kind of the conclusion of the bus tour, the first part?

21 A Correct. We had the buses parked there at Freedom Plaza on  
22 December 12th.

23 Q And this is also when you engaged with RMS Protective Services for the bus  
24 tour to provide security?

25 A Okay. Somewhere along the line, yes, we did. I don't know the date.

1 Q But you recall RMS being on the bus tour with you all --

2 A Uh-huh.

3 Q -- where they were providing -- okay.

4 A When you're on a bus, it's a magnet going across the country, whether it's  
5 people with road rage or, you know, someone will walk up and start screaming or  
6 something like that. But not only for the peoples' protection on the bus, but first and  
7 foremost -- I mean, obviously we care about our team, but also to make sure that kind of  
8 defuse the situation for vandalism or anything like that of destruction that could  
9 potentially happen to the bus that we were on.

10 Q And that's -- so that's one of the things I was trying to understand exactly  
11 was specific maybe security concerns or events that had led to the hiring of the security.

12 For example, on this first part of the tour, what might have occurred that might  
13 have been a threat for you all that you can recall?

14 A I don't know specifics on dates or when things happen, but I know that, at  
15 one point, there was an incident in Tennessee where there was a pipe bomb that was  
16 found or something like that. I was already in D.C., but there was an incident regarding  
17 a situation like that that they worked with local law enforcement there to make sure that  
18 everyone was safe.

19 There was another incident where someone approached the bus, and they had a  
20 knife. The bus was egged, and then, you know, my mom, myself, and various other  
21 people, whether it was, you know, Mike Lindell or any other high-profile names that were  
22 either joining for a specific stop, or maybe they came on several stops along the bus,  
23 there were, you know, death threats to us via social media, phone calls, things like that.  
24 So that's what they were engaged for.

25 Q Did you use any other protective companies, or was RMS the sole company

1       that you all used for the bus tour?

2               A     It was just RMS.   Like I said, for the first event, November 14th, we kind of  
3       loosely partnered with 1AP, but again, it was, like, more on a volunteer basis, and I  
4       believe that they asked me before a donation to the organization after.   I can't recollect  
5       if we ever did that or not, but it was never in a way that we engaged with RMS that there  
6       was a contract and legal responsibility and, you know, something like that, if that kind of  
7       makes a distinction and difference.

8               Q     And I know that I've heard just from talking to folks like you that there's, like,  
9       personal security and event security.   Did you all coordinate with locals for event  
10      security or was RMS also responsible for the event security for each stop on the tour?

11              A     I think that it was probably like a coordination of both, primarily us, but I  
12      think that there may have been times when they're, like, "Oh, hey, I know a friend in this  
13      area; let me reach out to them and see what they say," or "I know so-and-so in law  
14      enforcement," things like that.   So I think, again, it was more of a group effort that no  
15      one had specific defined roles, and if anybody had specific defined roles, it was probably  
16      more so of them that they just stayed in their lane and were doing their job.   But, as far  
17      as like everybody else, we were drinking from a fire hydrant, I guess, so to speak.   There  
18      was a lot going on, a lot of work to be done, and we were just, you know, all working  
19      together to try and accomplish the task that we had at hand at the moment.

20              Q     And you touched on this a little bit earlier, but I just want to make sure it's  
21      covered.   When you were partnering possibly with locals -- and "partner" might be a  
22      strong word -- when you were coordinating with possible locals for event security, it was  
23      never with like the Proud Boys or the Oath Keepers.   Is that fair?

24              A     Yeah.   Not to my knowledge.

25              Q     Okay.

1           A    There's actually -- there was another company at some point in D.C. -- and I  
2   don't remember if it was for November 14th or December 12th or maybe both that was  
3   another company that we hired to do event security and Cindy mostly was dealing with  
4   that.   And maybe that's the guy's name that was Chris that was the head of 1AP.   Are  
5   you allowed to tell me the guy that was head of 1AP?

6           Q    I think you're referring to the January 5th rally would be the separate  
7   security one --

8           A    No.

9           Q    No?   Different one than that?   Yeah.   I think I know who you're talking  
10   about, but I'm going to say from what I saw was mostly RMS for you all that you all  
11   coordinated with.

12           [REDACTED]   Just out of curiosity, is the other security company that you're  
13   referring to, Ms. Kremer, RKK?

14           Ms. Kremer.   Possibly.   I mean that doesn't --

15           [REDACTED]   That doesn't sound familiar?

16           Ms. Kremer.   I don't know what the company was called.   I'm trying to  
17   remember names specifically, but there was an issue specifically with this company and  
18   the guy who was running it with Cindy and her husband, and we felt like they were  
19   overcharging us and getting kickbacks from this guy that Cindy started seeing how -- that  
20   she felt that she could --

21           [REDACTED]   Are you referring to Mr. Lewis like Robert Lewis from 1AP?

22           Ms. Kremer.   Robert Lewis is 1AP.   That's the one that I had -- okay.   So,  
23   earlier, when I was talking about Chris with 1AP, that was not -- his name was Robert  
24   Lewis.   So just to go back and correct that.   And I'm sorry for that.

25           [REDACTED]   Sorry for talking over you.   On public permitting paperwork that's



1     been released by the Interior Department, a security company called Executive Security  
2     Concepts --

3             Ms. Kremer.    Yes.

4             [REDACTED]     -- which is Virginia-based and has a leader name Chris Ragone,  
5     R-a-g-o-n-e --

6             Ms. Kremer.    Yes, yes, yes.

7             [REDACTED]     -- if that helps to jog your memory.   That's just what's out there in  
8     the public.   So, with those names, maybe that helps to clarify who's associated with  
9     which --

10            Ms. Kremer.    Yes.

11            [REDACTED]     -- entity as you talk about these security groups.

12            Ms. Kremer.    And I apologize for that a little bit earlier.   But there were a lot of  
13     people in all this whole process, and it certainly is just a lot to remember since it was over  
14     a year ago.

15            [REDACTED]     Definitely understand.

16            Ms. Kremer.    But Robert Lewis is the one who I had the public exchange with on  
17     Twitter regarding Atlanta on the 20th.   Chris Ragone was the one who owned that  
18     executive whatever company, and he was -- I think that Cindy found him or was put in  
19     contact with him, but there was -- I can't remember specifically like what happened there.

20            I know that at one of the events -- and I don't remember if it was December 12th  
21     or November 14th, but they would not let me in the perimeter of the event.   I think it  
22     was December 12th, and it really made me very angry because I couldn't remember the  
23     guy's name who was in charge.

24            And I'm like -- and when I say "in charge," in charge of like the security or  
25     whatever, the Chris, but it could have been Robert Lewis.   Anyways, I say all of that to

1 say, I know that there was another company that was hired for onsite stuff in D.C. for  
2 either the November 14th or December 12th or both.

3 [REDACTED], please.

4

BY [REDACTED]

5 Q And I'm so sorry if you said this. I'm just trying to kind of unpack because  
6 we covered so many security companies, but do you remember the security companies  
7 that Women for America First used during the bus tour? I had RMS Security.

8 A And that's it.

9 Q But then you also said there was a possibility that -- and I want to make  
10 clear: When you say 1AP, you mean 1st Amendment Praetorians is that the same?

11 A Yes. Not for the bus tour. That was November 14th and December 12th.  
12 And, again, that was in a volunteer capacity that I believe that they asked for a donation.  
13 I don't know if we ever --

14 Q In regards to that, do you know how they would've asked for that donation?  
15 Like, did they email you, or would somebody have contacted you?

16 A No. I think it was just in passing of like, "Hey, you know, we're obviously  
17 doing this because we believe in kind of the mission of what you guys are working on,"  
18 but obviously with any sort of entity or group, you know, it takes funds and things to  
19 continue to get the word out about what they're doing and maybe recruit new members  
20 or whatever. I mean, I don't know. But I think it was just said in passing, and I think  
21 that it was maybe passed along to me via Cindy said something to me about it.

22 Q And, to your knowledge, was a donation ever made?

23 A I have no recollection of that. Possibly, but I don't recall.

24 Q If somebody did make it, do you know who it would have been?

25 A I mean, it was either myself or my mother, but -- or Jennifer, but I don't have

1 any recollection. There were a lot of -- there was a lot going on all at the same time,  
2 so --

3 [REDACTED] I totally understand that. That's very helpful. Thanks.

4 Ms. Kremer. In regards to that, I do want to point this out, [REDACTED] that when  
5 you're asking about, you know, the hiring and the volunteer group and all of that as far as  
6 security goes, there was an issue, like I said, with the Chris Ragone that -- from the first  
7 event on November 14th, I guess, it would -- just making this connection in my head.  
8 Chronologically it would make sense that, on November 14th, then to December 12th,  
9 there was like a significant increase in pricing that happened. And I don't believe it was  
10 based on the number of people that he was, quote/unquote, employing under his  
11 contract with us. And we very much felt that Cindy was and her husband were getting a  
12 kickback from Chris about that, and it made us feel very uncomfortable.

13 BY [REDACTED]

14 Q Thank you. Thank you for clarifying that and providing that context. So  
15 that takes us now past the first part of the bus tour December 12th. You all have the  
16 rally again in D.C. at Freedom Plaza again. Kind of like the first rally we discussed on  
17 November 14th, whose idea was it to hold this rally on December 12th? Was it always  
18 the idea to end it in D.C. on December 12th?

19 A Yes. And I can't remember off the top of my head of what the significance  
20 of December 12th was, but there was a specific reason --

21 Q Was it that the electors in each State --

22 A Yes. Yes. They were going to D.C., yes.

23 Q Okay. So you all were tracking that date kind of when you were planning?

24 A Yes. Yes. And so we kind of reversed engineered the tour to end up back  
25 in D.C.

1 Q Right. Do you recall how you all became aware of like the State electors, or  
2 was that something that was just always out there that you were tracking?

3 A I don't remember. During this timeframe, [REDACTED] so I missed a  
4 portion of the bus tour of kicking it off, but I was working from home, [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED] So --

8 Q I'm assuming that wasn't fun, especially with the stressors of just putting  
9 together all these events at the same --

10 A Exactly. So that's why I'm trying to place all of this chronologically in order.

11 Q And, again, so it was the certification of State electors. Was there any  
12 discussion, to the best of your recollection, of why you had it in D.C. versus maybe in the  
13 State capitals that you all -- that you kind of discussed earlier? Like why D.C. again?

14 A I mean, it's our Nation's Capital.

15 Q Okay. No. I'm just trying to understand the Nation's Capital versus local  
16 capitals, right, because you've done events in local capitals?

17 A Right. Right.

18 Q How was this event -- who did you, I guess, coordinate this event with?  
19 You didn't do it with Ali Alexander's group this time. So explain to us how that decision  
20 was made and then maybe who you planned it with?

21 A Well, it was very clear and distinct after November 14th that we wanted to  
22 put as much distance between us, Alex Jones, Ali. They had then started going and  
23 making very public statements be it, I guess, social media, periscoping, different things  
24 that were being said about myself, my mother, the leadership of Women for America First  
25 that were just -- first and foremost, unkind to speak to anybody that way, but especially

1 women when you're talking about a conservative movement and how, you know,  
2 supposedly Republicans are the ones that put women down. I don't believe that, but it  
3 was disheartening to see a man speak to women that way.

4 Also, just the disinformation that they were saying about how they paid for the  
5 event, and we hijacked it, and we were hijacking the "Stop the Steal" and all of that. I  
6 mean, it was just false, and it was creating dissension, and no one had time for any of that  
7 BS. I mean, we were all just trying to figure out where the status of the election was,  
8 what was going on in these different States to finalize the votes for the electoral college.

9 So can you repeat your question? I'm sorry.

10 Q I think the question was just like why the decision was made not to partner  
11 with Mr. Alexander this time compared to November 14th?

12 A Right. So, again, I didn't really even want them to be there at  
13 November 14th, but I felt the only appropriate thing because they had helped get the  
14 word out -- you know, you treat others how you want to be treated. So we allowed  
15 them to be a part of November 14th and gave them a very small, little role and but  
16 appreciated their efforts to get people to D.C. But, as far as the December 12th, we  
17 needed to make a very clear distinction because I'm sure, as you guys have seen from  
18 November -- early November to that point in December, their rhetoric, again, was getting  
19 a little more aggressive in tone and encouraging things like we had seen with  
20 November 20th of, you know, storming inside the Georgia State capital that we just really  
21 needed to make a distinction between the two groups.

22 Q I know that there was another march going on in December 12th like the  
23 Jericho March. Did you all do any coordination with that organization -- like that  
24 planning of a Jericho March or was this like a separate --

25 A So I wasn't specifically, but there were members of the March for Trump

1 team that were coordinating with them. We wanted to work with them, but Ali got his  
2 hooks into them and spread disinformation about our organization and tried to create a  
3 false narrative that we were doing inappropriate things with money, and it became a very  
4 contentious situation.

5 And Mike Lindell was also involved with the Jericho March, and it was just  
6 very -- it was just like very muddy waters. Because I believe the Jericho March was early  
7 that morning.

8 Q Correct.

9 A If I recall, and we were going to be trying to basically kind of do both of, like,  
10 support them at their event because, again, we want to, you know, encourage other  
11 people and work together. You're stronger standing in larger numbers, but at some  
12 point there was a breakdown between all of it. Actually, I think my air buds just died.

13 Q Fair enough. I had the same thing happen to me earlier today. So I  
14 definitely understand that. Can you hear me?

15 A Sorry, yes. Okay.

16 Q So it sounded like -- you actually went to kind of my next question. It  
17 looked like Mr. Lindell was supporting the Jericho March. Was he also helping to  
18 support your event on December 12th?

19 A [Inaudible] a lot of cross over between different people, you know, that  
20 spoke at our events that were working with other groups in supporting them in different  
21 capacities. I'm not sure of what the dynamics were there, but I think that Mike spoke  
22 that morning at the Jericho March because I remember talking to him just as far as  
23 scheduling about that that he was going to be there supporting them.

24 Q And then War Room and Mr. Bannon, did they have any planning with the  
25 December 12th rally? And I ask that because I do recall seeing a text with you and your

1 mother where I think your mother -- your mother says, "I'm on bus B, trying to get  
2 Bannon here."

3 Was that part of -- was he just part of the planning for December 12th?

4 A Again, not planning, but getting the word out, and I think that that probably  
5 was in reference to, again, getting Steve out there would bring more notoriety and get  
6 more people to come out. I mean, he doesn't do many events publicly. He doesn't do  
7 many speaking engagements like that. So I know that that was something that we  
8 continuously asked for, but, you know, his safety and security was an issue and him being  
9 a target for things. And so people pulled their weight in different capacities.

10 Q Right. So crowd building, right, like we talked about earlier? He was part  
11 of the crowd building effort?

12 A Right.

13 Q And then I know that the President flew over your event on his way to the  
14 Army-Navy game. Did you all have any coordination with that?

15 A Not coordination. I think that there may or may not have been a heads-up  
16 text message that was sent to my mom.

1

2 [12:17 p.m.]

3

BY [REDACTED]

4

Q Right.

5

A Um --

6

Q I guess a better way of asking it is had you all requested President Trump's

7

presence at the rally?

8

A Well, I don't know specifically that it was requested like through any formal

9

channel, but, obviously, the invitation was very clear that it stood, you know, saying

10

things on social media, just -- I think that it was pretty clear that anybody would want the

11

President of the United States to come to their event.

12

Q Yes.

13

A And I think it's an understood thing that he would have an open invitation.

14

If he decided he wanted to go, absolutely.

15

Q And then, again, with this, help me understand. When did the -- it looks

16

like you all went from Freedom Plaza to Supreme Court again for this event? Walk us

17

through again how that was supposed to play out. So you're going to end at the

18

Freedom Plaza and then you all marched together to the Supreme Court like on

19

November 14th? Was that the plan?

20

A I believe so, and I think it had to do with scheduling of different people, you

21

know, what time they were able to speak, not speak, logistics of getting them -- like, if

22

they were only able to speak later on in the afternoon, getting them to the Supreme

23

Court was easier than to be getting them around Freedom Plaza. I think that that more

24

so played into it.

25

And then also, you know, we had obviously had done it at the one prior, and we



1        liked the kind of informal nature of the Supreme Court, because, again, I think that the  
2        whole thought process was that it was going to end up at the Supreme Court at some  
3        point, or potentially could end up there.

4                Q        And I know that this was over a year ago, but do you recall any of the  
5        speakers who might have spoken at the Supreme Court?    Because, like I said, the  
6        Freedom Plaza part, it's easy to find who might have spoken.    But at the Supreme Court  
7        can you just let us know if you remember who might have been speakers there, if you  
8        know?

9                A        Um, I can't really remember because I didn't go to the Supreme Court to  
10       speak at that event because I was very jolted.    The previous day, Alex Jones threatened  
11       me outside the Willard Hotel.    And on November 14th, he actually did storm our stages  
12       with his people.    He pushed Congressman Gohmert, and it was just a volatile situation.  
13       And we were also tired, right.    We had just come off the bus tour. [REDACTED]

14       [REDACTED]

15                So I stayed at Freedom Plaza, and I think part of the reason that I stayed at  
16       Freedom Plaza too was that there were so many people that were already, you know,  
17       there at the Supreme Court that we needed to kind of get that show on the road, so to  
18       speak, even while we were continuing what was going on at Freedom Plaza because there  
19       were already people there that had either previously marched there or, you know,  
20       started there.

21                So I went on a golf cart at the very end of the Supreme Court, and I think that Alex  
22       Jones was there, and I stayed on the golf cart with security, because I didn't want to be a  
23       part of that.    I think my initial thought was to go up there and, like, thank everybody at  
24       the end or whatnot.    But when he was there and there was an altercation again on  
25       December 12th with him at the Supreme Court stage, I didn't even get off the golf cart.

1 Q And this is the altercation you --

2 A Actually, I shouldn't say I didn't get off the golf cart. There may have been  
3 a point that I got off the golf cart, but I didn't get up to go and be really a part of that  
4 event that I recollect. I could have said something, but I'm pretty sure that I tried to  
5 keep my distance from him.

6 Q And this is around, when I see your messages when you were  
7 communicating with Detective Ellis, was this about the Willard incident and just keeping  
8 him apprised of what was going on?

9 A Yes. And Detective Ellis is a woman.

10 Q I'm sorry. I apologize.

11 A No. That's okay. I'm just letting you know.

12 Yes, from my understanding, there was a warrant out for his arrest, and I can't  
13 remember if she was getting info from other people. I know that I talked about him  
14 pushing Congressman Gohmert, so I don't know what her -- I don't know all that was  
15 going on with what exactly she was doing. But I do believe that she would've asked me  
16 at some point to let her know if I knew what his locations were, or if he were to ever  
17 come in my vicinity, or whatnot, because of not only what he said to me, but then also,  
18 how he and his little minions around him had stormed the stage on November 12th in  
19 both locations, at Freedom Plaza and at the Supreme Court.

20 Q Right. And that played out in your messages when you sent her the link to  
21 the -- it looked like the incident of Mr. Jones at your SCOTUS stage on December 14th as  
22 well.

23 A Right.

24 Q Overall, how would you describe how the event on December 14th turned  
25 out? Just give us a sense, whether it was a success or not.

1           A     I certainly think it was a success. We were proud of the bus tour that we  
2     had just, you know, accomplished, and we felt like people were paying attention, a lot of  
3     people that were not previously engaged in the political activism realm before, and we  
4     were optimistic that there were several different paths and avenues to try and go with  
5     the election to see -- to make sure that we get these States and local jurisdictions to have  
6     accountability and transparency with the voting process.

7                 And there was, again, no real violence at our events at Freedom Plaza or SCOTUS,  
8     despite the Alex Jones thing, which we knew previously.

9                 One thing that I do want to go back and talk about is on November 14th, at the  
10    Supreme Court, the Supreme Court Police were staging antifa and BLM on the backside of  
11    the Supreme Court, opposite of where we were. And I don't remember his name, but  
12    the chief police officer for the Supreme Court kept kind of like eye motioning, like this  
13    [indicating], and then pointing to his watch, like, how much longer. And then I would go  
14    over and talk to him. How many more speakers he wanted to know, because they had  
15    staged BLM and antifa on the other side, keeping them away from, you know, our  
16    supporters and the people there. And as the day kept continuing longer and longer,  
17    they were concerned about nightfall, you know, just in darkness that it's harder to control  
18    things and to see what's going on.

19                And then, B, it had been a very long day. There was obviously no permit, and  
20    they wanted us to wrap things up.

21                So, you know, as we continued to add a couple of the new congressional  
22    members, like we spoke about earlier, obviously, things continued to go a little bit later.  
23    But at some point, you know, that conversation was had, like, okay, we need to be done  
24    because we need to not have this erupt into -- I guess, the BLM and antifa people were  
25    getting more and more restless and creating a difficult situation for the Supreme Court

1 Police to kind of contain.

2 That is very different from anything that we saw on January 6th. Again, on  
3 December 12th, they were contained in an area to try and keep everybody, I guess,  
4 separated, you know.

5 Q Okay.

6 A So I just wanted to go back and make that distinction.

7 Q Thank you. And we'll get to the January 6th probably, actually, after our  
8 break.

9 One thing I wanted to end on with the December 12th rally is we're aware that,  
10 like, there was a stabbing of a Proud Boy, or there was an altercation with Proud Boys in  
11 the city.

12 Do you recall that, the night of December 12th?

13 A I remember that there was -- was December 12th when they were around  
14 some square or something?

15 Q Correct, yeah. And one Proud Boy ended up getting stabbed. It was the  
16 night after your event.

17 I guess I'm just trying to understand -- or just trying to see if you were aware of  
18 any security incidents, like other than that, that might have occurred on December 14th,  
19 or after your event?

20 A No. December 12th.

21 Q December 12th. I'm sorry.

22 A No, I don't remember specifically. I knew that there was violence that had  
23 broken out. But to my knowledge, it was away from -- again, it was at dark, at night, but  
24 it was in whatever that square was called, and I can't remember what it was called.

25 Q Yeah.

1 A But where BLM was painted on the --

2 Q Black Lives Matter Plaza?

3 A Yeah, maybe. Maybe that's what it was. But it was in a different location  
4 than Freedom Plaza or the Supreme Court.

5 And then there was also the incident of things were launched at people sitting  
6 outside eating, whether they were, like, sparklers or fireworks or -- I don't remember if  
7 that was December 12th or November 14th. But there were incidents like that. But,  
8 again, it was at night, well after our events had concluded, or when people were not, you  
9 know, in a larger group congregating. It was one-off of someone wearing a Make  
10 America Great Again shirt that they would be, you know, approached or attacked, or  
11 things like that. But to my knowledge, from what I read and saw on media reports.

12 Q Gotcha. So around Lafayette Square, Black Lives Matter Plaza is what  
13 you're describing, not really at Freedom Plaza or at SCOTUS, or anything like that?

14 A No. There was some incidents about -- well, around Freedom Plaza, with  
15 the Willard Hotel that evening. I don't remember if it was November 14th or  
16 December 12th, but where people were sitting outside where things were fired at them,  
17 like sparklers, fireworks, something like that.

18 Q Okay.

19 A I mean, I remember seeing that on the news. But I wasn't part of that, and  
20 it was, again, well after our event concluded and everything was wrapped up.

21 [REDACTED] Okay. Well, I believe, if [REDACTED] or  
22 anyone else has any follow-up, they can ask now. And if not, I think this is probably a  
23 good time to break for lunch for 30.

24 Dave, does that work? Come back at 1:00?

25 Mr. Warrington. Kylie, does that work for you or --

1 Ms. Kremer. That works.

2 Mr. Warrington. Okay.

3 [REDACTED] All right. We'll come back on at 1 o'clock.

4 Mr. Warrington. We'll see everybody at 1:00.

5 [REDACTED] Thank you.

6 Ms. Kremer. Thank you.

7 [Recess.]

1

2 [1:05 p.m.]

3 [REDACTED] Looks like we have everyone back, so we will go back on the  
4 record at 1:05 p.m.

5

BY [REDACTED]

6 Q So moving on now, when we left off, after the December 12th rally and  
7 immediately afterwards, it looks like Women for America First, you and Ms. Amy Kremer  
8 launched the bus tour, what I call part 2.

9 So what were -- what were you trying to accomplish, I guess, the second part of  
10 the bus tour? What was the goal?

11 A Again, moving forward to January 6, where the Electoral College was going  
12 to be certified, to keep pressure building to let people know, again, that we were focused  
13 on what was going on and to keep the momentum, as far as like getting more people  
14 involved, just leading across the country; and also, to put pressure on some of these  
15 Members of Congress, whether Senate or House, to know that they had the support; that  
16 if they felt that there was evidence that the American people needed to hear without the  
17 spin of the media, that they knew that they were supported across the country to stand  
18 up and bring that evidence forward in the joint session.

19 One of the things that we have seen is that just in the political world that it is  
20 today, people are really quick to jump on and say when people are doing things wrong,  
21 but they are not often praised or reminded when they are doing something right. So we  
22 are big proponents of that, of wanting to make sure that things are positive, and that that  
23 message is conveyed to the Members of Congress.

24 Q And I want to make sure I can track this. So I believe the bus tour started,  
25 like, within the same week of the December 12th rally. You all were already -- already

1 had January 6th kind of on your brain at that point when you started the bus tour, part 2?

2 A Well, I think that that was the next kind of chronological thing that made  
3 sense. I don't know at what point the tweet that President Trump sent out about  
4 January 6th, but it was along that same time frame. I mean, it was something that was  
5 being discussed just in general amongst people across the Nation about what's the next  
6 logical point that we can feel like there's a path forward or not. You know, some of the  
7 cases were going through the court system, um, so that date kept floating out there.

8 It's kind of like with the Tea Party movement, one of the most natural dates that  
9 we did was April 15th. It was Tax Day, right. So that's kind of, I guess, reverse  
10 engineering it, how do we make this work.

11 Q And we'll get into this more later, but I just want to make sure I cap -- so was  
12 the President's tweet, I believe he said -- it was on December 19th where he said, "Be  
13 there at the protest, wild, wild protest."

14 Was that kind of your first awareness of January 6th, or were you aware of it  
15 before this --

16 A No. We were aware of it prior to that. But that was, you know, the first  
17 time that, I guess, we heard from anybody publicly that that's where the direction was  
18 officially moving. We were all kind of putting our ducks in a row to see what -- again,  
19 what was happening with these court cases, what was happening in the different States.

20 So there were a lot of different pieces that were playing into all of this to find the  
21 natural next progression, if that makes sense.

22 And so, when that, you know, tweet was sent out, it basically solidified like, Okay,  
23 this is the correct direction that most people are going to get behind and follow, as far as  
24 this is the next path that we need to focus on.

25 Q And that's around the time -- and we have seen evidence of that, of your



1 tweet. It was before the President's on December 16th that you were going to conclude  
2 in D.C. on January 6th.

3 But is it fair to say that the President's tweet now made it a bigger item in your  
4 mind for January 6th?

5 A Um, I think that we were seeing a lot of different -- with the previous two  
6 events, a lot of people trying to be kingmakers for themselves or to make money off of  
7 things that -- it's, like, where the heck have you been over the last 4 years and now, all of  
8 a sudden, you're trying to jump in front of the bandwagon, so to speak?

9 So I think that that was a way that it was, like, okay, well, now that it's been  
10 solidified, that this is the next thing that people are going to focus on because we can't  
11 control what's going on in the courts, you know, that has a process that plays out, that  
12 this is the next thing that we can give people a tangible thing to look forward to and to  
13 focus on to be putting pressure on their representatives across the country.

14 And so, again, it was just kind of all around the same time frame.

15 Q That's fair.

16 And so that leads us into the planning for the January 6th event. And so, we'll  
17 start with kind of the permit process and the initial planning.

18 It looks like the first permit that was filed was on November 24 by Ms. Chafian on  
19 behalf of Women for America First, and then the rally for them was supposed to be held  
20 on January 23, 2021. Does that sound about right, at Freedom Plaza?

21 A So we had a tentative date that was put as a placeholder because that could  
22 always be amended, but if we -- from my understanding of the way the permitting  
23 processing works with National Park Service and the different agencies there in D.C. is  
24 basically if you're the first one in line, you're going to get the permit unless there's a  
25 reason for you not to get the permit, right? So if we went ahead and submitted

1 something not sure that that was actually going to be the date, it could always be  
2 amended to being the date that we needed.

3 So we wanted to get that process rolling as, I guess, early as we could. And so,  
4 yes, Cindy put the first permit in. And I guess you're telling me that it was for  
5 January 23rd?

6 Q Yes.

7 A Okay.

8 Q And I guess that was going to be my next question was, was there any type  
9 of -- what was the significance of the January 23rd? I understand it was a placeholder.  
10 But was that, like, a date that you all might have been eyeing in the future or --

11 A I can't remember. There probably was a conversation, or a couple that  
12 were had surrounding it. But, again, there were so many different pieces in play that all  
13 of this could have been over by the end of the year, right? So I don't think that there  
14 was any -- at least to my recollection, any significance necessarily of January 23rd, just in  
15 general that this was the direction that we were heading.

16 Q Gotcha.

17 So when you all make the decision to switch, to amend the permit to January 6th,  
18 are you going into this thinking that this is the President's last rally? Is that kind of the  
19 mentality as you're heading into this planning?

20 A No. I mean, we were doing the same thing that we had just done two  
21 previous times, December and November, there in D.C. And, obviously, we, again,  
22 wanted him to come, but there -- I mean, he's the President of the United States. Even  
23 if he is confirmed to be coming, until he walks on that stage, you never really know what  
24 he's going to do, right?

25 Q Right.

1           A    He's able to make his own choices.

2           So I think that that -- obviously, we wanted him to be there, but I didn't know that  
3 it was going to be his last rally or that he was even going to actually be in attendance.

4           Q    Okay. So the President tweets about the protest on December 19th, and  
5 then it looks like Ms. Chafian amends the permit to move you-all's permit to January 6th  
6 the same day, December 19th. So do you recall a discussion after the President's tweet  
7 saying, okay, let's really start stepping up our planning for January 6th?

8           Do you recall that?

9           A    I don't remember specifically, but it was all kind of happening in tandem.  
10 We were -- I believe by December 19th, we were headed out to the West Coast because  
11 we kicked off the second tour.

12           I can't remember the exact date that the second tour was kicked off. Do you  
13 have that date?

14           Q    It was around that time, that's correct.

15           A    Okay. So we had spent a couple of days in Nashville, or just right outside of  
16 Nashville while the bus was being rewrapped, and then we were making our way to the  
17 West Coast. And there was a lot of things that, again, were at play with this, seeing  
18 what was going on in individual States, following the court cases, that sort of thing.

19           So at some point, you know, the directive was, obviously, from leadership at  
20 Women for America First to give Cindy -- you know, okay, please amend it to January 6th.

21           Q    Did you or your mother have any advance knowledge that President Trump  
22 would tweet about, you know, a January 6th rally on December 19th?

23           A    Well, I can only speak for myself, but no, I did not.

24           [REDACTED] Okay. [REDACTED]

25           [REDACTED] Yeah.

1

BY [REDACTED]

2

Q I think we just want to understand the sequence as best you can remember

3

it. There's sort of a chicken-and-an-egg quality, because I know that there's the

4

President's tweet, and then you had tweeted, and you -- that was the tweet that you end

5

up getting retweeted by the President I think at some point.

6

But we're just trying to understand the sequencing of this because, from the

7

conversation we've had you until this point, I think you've said that you understood that

8

January 6th was going to be an important day in Washington, D.C. And it seems that

9

you understood that before you amended the permit, right?

10

A I can't specifically say that I know that. I mean, it was all happening around

11

the same time. It could have, you know, been just a conversation that was being had

12

amongst us with how we understood the whole electoral process being had, or it could

13

have been a news article that referenced that maybe this is the next natural day.

14

But I didn't know that that tweet was going to be going out. And, again, just

15

because a tweet went out, I didn't know that the President was actually going to come

16

until the President actually came.

17

Q Oh, sure. And we understand that, and I think that's clear from the

18

communications that, obviously, even at the point where any group may be coordinating

19

with the White House to try, you know, it's clear that nothing is guaranteed until the

20

President is actually there.

21

A Right.

22

Q So we understand that.

23

I think you've answered the question, though, is that there was not any kind of

24

coordination between --

25

A No.

1 Q -- your -- between Women for America First choosing to put on a formal  
2 event on January 6th and the President's tweet about having -- about knowing that there  
3 would be gatherings on January 6th?

4 A Correct.

5 [REDACTED] Okay. Thank you.

6

BY [REDACTED]

7 Q And I think we have just a tweet -- just to make sure we refresh your  
8 recollection, we'll mark these tweets as exhibit 59.

9 Do you mind putting it up on the screen, [REDACTED]? These are Ms. Kremer's tweets  
10 from December 16th that we were just referencing.

11 So we can understand the timeline right, so we have December 16th you  
12 saying -- this is the tweet that I was just referencing -- "We have some very exciting news  
13 coming soon, the March for Trump." And this is December 16th.

14 Okay. And then keep going down so we can see the date.

15 Perfect.

16 December 16th, go back up.

17 And, again, it's you tweeting that she has put on two largest events that the  
18 American people have ever put on for POTUS.

19 And this is in reference, I believe, to the November 14th and December 12th  
20 rallies.

21 A Right.

22 Q Sending shock waves, so help us keep fighting.

23 And go to the third page --

24 [REDACTED] And, [REDACTED] I will just note that the link at the bottom here  
25 specifically references January 6th.

1 [REDACTED] Correct. Thank you, [REDACTED]

2 BY [REDACTED]

3 Q It references January 6th in the link that you're tweeting on December 16th.  
4 And then on December --

5 A Can you actually just scroll back up to that? Because I want to point up  
6 something out about that. It also says -- on that same link that you're talking about, it  
7 also says November 29th to January 20th.

8 Q Right. Okay.

9 Can you explain the significance of that? The tour was going to continue after  
10 January 6th? Is that kind of the significance?

11 A What I'm saying is that there were a lot of dates that were continuously  
12 being thrown around but until an official announcement was made.

13 Q Gotcha. So, like, adding a new city, for example, let's say you have the  
14 regular bus tour going on, you add Raleigh, North Carolina, as a new date, you're saying  
15 that this is, like, similar to that?

16 A What I'm saying is we're -- it was just pointed out that January 6th is a  
17 specific that, like, that was the announcement, and I'm saying that that was not. I don't  
18 know how that exactly populates from Anodot. That could have been something that  
19 was populated later after January 6th was announced, and that's kind of the thing that's  
20 in the -- I don't know how you would say it -- metadata. It's a techie thing. I'm not  
21 very techie. But that's something that populates there that relates to the website when  
22 you put the URL in.

23 So I don't know when this screenshot was taken. I don't know that it said  
24 January 6th on there when I tweeted that out at 5:39 on December 16th.

25 Q Oh, so you're saying that you know don't know what that screenshot is

1 generating from the website for January 6th when you tweeted it out, like you don't --

2 A What I'm saying is if you went to this -- or anybody went to this secured  
3 dot -- Anodot.com, whatever the whole URL is, if they went to that, let's say, in February  
4 of 2021, it could have already been changed within the website to mark it as January 6th.

5 Q Got it. Okay.

6 Mr. Warrington. Hey, [REDACTED] just for clarity, this is exhibit 59?

7 [REDACTED] Yes, we're adding it on to exhibit 59, correct.

8 Mr. Warrington. Okay.

9 [REDACTED] And then let's keep scrolling down. Let's go down, [REDACTED] to the  
10 December 19th President Trump tweet.

11 BY [REDACTED]

12 Q So you have those tweets from you talking about big announcement coming,  
13 and then we have the December 19th tweet from the President, "A big protest in D.C. on  
14 January 6th. Be there, will be wild!"

15 There was no, to your knowledge, coordination with the White House in this  
16 sequence of putting these tweets out?

17 A No. Not that my advice was asked, but I wouldn't have put an article with  
18 an announcement of a date if that was the official announcement of a date.

19 Q Okay.

20 [REDACTED] Any follow-up from anyone else there before I get back to the --

21 Ms. Kremer. Can you scroll up just a little bit, please?

22 Okay.

23 Ms. Kremer. Okay.

24 [REDACTED] So let's get back to the permits --

25 Thank you, [REDACTED].

1

BY [REDACTED]

2

3

Q So the same day as the President's tweet is when Ms. Chafian amends the application for January 6th.

4

5

6

7

8

Your first two rallies that we discussed earlier today, on November 14th and December 12th, there was the Freedom Plaza portion and then a SCOTUS version. Was that the plan for January 6th as well, to have, like, a Freedom Plaza -- this is before the Ellipse could get out -- to have at Freedom Plaza and then at SCOTUS? Was that the plan?

9

10

11

12

13

14

A I think that that was a tentative plan possibly. But, again, there were so many things that were playing into all of this that if there had been some sort of definitive answer, and I'm not a lawyer, but, like, definitive answer that it wasn't going to end up at the Supreme Court, maybe we already knew at that point. I mean, there were just so many different avenues, I guess, that were being explored with making sure that we got the election correct, that there was never an official plan until it happened that day.

15

16

17

18

19

20

I mean, something that we experienced from speakers was having no formal, you know, set times with the previous two rallies because things were in constant motion; that when I was giving them their times, it was, you know, the morning of or during the event. I remember people being upset because they weren't going at their exact time. But it was, again, because there were so many things that were playing into all of this, and, you know, we had breaking news a lot, and that certainly plays into all of this.

21

22

So I would say, you know, initially, sure, we would probably implement the same things that we had done November 14th and December 12th. Why wouldn't we?

23

Q Thank you.

24

25

So also on the same day -- so we're just going through, like, almost a flurry of activity on December 19th -- it looks like Ms. Chafian also filed an application for area 15



1 of the U.S. Capitol Grounds, so it's an area on the -- do you recall why that application was  
2 filed, what the thinking was in filing that application?

3 A Same thing back to when the January 23rd date was put. I think, if I am  
4 remembering correctly, we had discussed previously having stuff at the Capitol and not at  
5 Freedom Plaza. But, I guess, there was a lot of construction that had already been  
6 started with the inauguration, so it was difficult, and we were getting a little bit of  
7 pushback from them about, like, is this really the best place, you know? And, so, I think  
8 that that probably led into that application being filed as well.

9 You know, again, just seeing the different avenues that the whole election could  
10 take, whether it was the court system, through the Electoral College, and whatnot, that  
11 we had that option if we wanted to pursue it.

12 Q So at this time on December 19th -- and I know it's probably difficult to  
13 pinpoint, you know, what you were thinking at certain times, but was the plan  
14 preliminarily like the other two rallies in D.C., to go from Freedom Plaza and then march  
15 to the Capitol? Was that kind of the preliminary plan?

16 A So, to the best of my recollection.

17 But, honestly, the best person that's going to be able to answer these questions  
18 regarding leading into January is going to be my mom. And the reason is because Cindy  
19 and I had a personal breakdown before that, and there was not a lot of constructive  
20 communication being had between she and I because of her behavior around the 12th.  
21 And leading up to the December 12th, there was a time on the first bus tour when she  
22 made everybody feel so uncomfortable. She's very aggressive. And I hate talking  
23 about another woman this way, but not a very likeable and approachable person. The  
24 only reason that she was on the first bus tour was because I could not start on the bus  
25 tour [REDACTED]

1           So when she was asked to basically be another person to be there to help, you  
2   know, with everything, it was never the intention for her to stay certainly after I got  
3   there, number one, because it just wouldn't have been needed. But then, secondly,  
4   when the breakdown sort of happened between her and I, between when I got on the  
5   tour to then December 12th, we wanted her, like, fired, let go, however you want to say  
6   it.

7           And when I say "we," I'm saying collectively as March for Trump, the team  
8   that -- like I said, she's not an approachable person. She's very aggressive, a total  
9   control freak. I will say she's an incredible type A personality, that you give her a task,  
10   she gets it done. And that's why my mom and I had enjoyed working with her  
11   previously because my mom and I are [REDACTED] and -- so  
12   she was really great at, you know, executing tasks and staying on track.

13          But there was a time on the bus tour when she made everybody feel so  
14   uncomfortable that everybody got off of one bus and got onto the other bus, and she was  
15   the only person on that bus other than, obviously, the bus driver and, I think, one security  
16   guy.

17          But just very weird. She had like these Reiki stones that she would lay all over  
18   herself and just very weird things that she would say. And not to be offensive to  
19   anybody that does any of that, but just very aggressive, weird and then tried to be, like,  
20   very Zen and, like, Your Chakras are just off. And it's, like, No, you're just rubbing me  
21   the wrong way.

22          Q    Right.

23          A    So when -- then leading into December 12th, obviously, the event -- or the  
24   altercation happened with Alex Jones on December 11th, and following the  
25   December 12th event, she randomly comes up into the hotel suite and tells us how she

1 just had breakfast with Alex Jones. And I'm sitting there thinking is anybody else finding  
2 this very weird that, you know, someone that's, quote/unquote, your boss has a major  
3 issue with this man, who has a warrant out for his arrest right now, and you just thought  
4 it was appropriate to go and sit and have, like, a pleasant conversation with him about  
5 that you feel like it's your calling to maybe help bridge a gap between us that maybe  
6 there's just some misinformation being spread around by other people and other  
7 organizations?

8 And when I heard that, Jennifer and I were very clear that -- to my mom that we  
9 wanted Cindy gone. She was not coming on the next tour. And we didn't want her a  
10 part of January 6th.

11 My mother, as chairman of the organization, decided to meet us halfway basically,  
12 and said, Okay, she won't come on the next tour. There's no reason for her to. The  
13 only reason that she was on the original tour [REDACTED] She won't be on  
14 the next tour, but we can have her on the ground in D.C. She's a great type A  
15 personality getting things done. Let's have her continue with handling logistics and  
16 helping, leading up to whatever our next big event was going to be. And she, obviously,  
17 is outside of Virginia, so she can get to D.C. very easily and very quickly.

18 That also solved a lot of the problems with the rest of Women for America First,  
19 March for Trump team members that personally had with Cindy, again, you know, being  
20 rubbed the wrong way and that sort of thing. So it kept everybody happy to do things  
21 like that.

22 Q Okay. Thank you.

23 So if I'm understanding you correctly, when it came to some of the direction that  
24 Ms. Chafian might have been providing in this time frame, it's fair to say it was coming  
25 from your mother and not from you?

1           A     Primarily. There may have been conference calls or group emails or group  
2     texts or something like that. But it was either probably through my mother or Jennifer  
3     Hulsey.

4           Q     So, for example, if there was, like, a decision not to indicate that there might  
5     be a march on January 6th, on those initial, like, December 19th amendments, that was a  
6     discussion that your mom or Ms. Hulsey might have had with Ms. Chafian? You weren't  
7     directing Ms. Chafian, correct?

8           A     Correct, correct. But she also wasn't involved in the conversation of when  
9     we were moving things to the Ellipse.

10          Q     Who -- your mom wasn't involved in those conversations?

11          A     No; Cindy.

12          Q     Okay, okay. We'll get to that in a second.

13          A     Okay.

14          Q     Okay. One thing that stood out to us with the -- and that's such a bad way  
15     of saying it, just something that came up. When we were reviewing the Capitol permit,  
16     it listed 50 people, but then the Freedom Plaza event listed 5,000 people. And this was  
17     both from that December 19th application amendment.

18                I guess we're just trying to understand the difference in the number of attendees  
19     that were going to come on the same types of applications applied for on the same day?

20          A     Right. So I'm actually glad that you asked that because that was not  
21     something that I was aware of until I took over the permitting process for Women for  
22     America First leading into January 6th.

23                To my understanding of the way that I understand it now, at the time when Cindy  
24     was filing for these applications for the permit, obviously, there were a lot of restrictions  
25     and things changed because of COVID and whatever the mayor was doing within the city.

1 At the time, we were told by Cindy that whoever she was talking to at NPS or dealing with  
2 the permit, which I believe was Marissa Richardson -- that's who I dealt with January 6th,  
3 and I believe that that was also who Cindy was dealing with -- she had said that we know  
4 that whatever you put on the application is not going to be accurate, but according to  
5 whatever current bylaws or parameters -- I don't know how to say it properly, but that it  
6 was at 50 people, or whatever the number was.

7 And so the number that was submitted on the application needed to be less than  
8 that, but that they knew that it was going to be different. And by that point, it didn't  
9 really matter because the COVID restrictions could have changed, right? They could  
10 revoke the permit or they could have all been lifted.

11 So Cindy did let us know that that was going on, but she said that she was directed  
12 by Marissa to do so.

13 Now, I think that that is important because when I had this conversation and took  
14 over the permitting process for January 6th, Marissa made it very clear that if you are  
15 putting something on a document that you know to be invalid, that's a major issue  
16 because this is a Federal Government form that you're filling out and you're willingly  
17 putting something that is not truthful.

18 So I was horrified when I found that out because it was the opposite of what Cindy  
19 had told me, and that's one of the main reasons that we decided from that point not to  
20 pursue the marching permit because there was no way, whatever those current COVID  
21 restrictions were -- I don't know if it was 50 people or 500 people -- whatever they were  
22 at that time, there was no way that I was going to put our organization's name and my  
23 name on a permit that I knew would greatly exceed that number and then face potential  
24 ramifications.

25 Q So you were dealing -- I believe Marissa Richardson is with NPS. And this

1 was the Capitol application with the Capitol Grounds. Were you talking with  
2 Ms. Richardson about the Capitol Grounds permit as well?

3 A So I was talking to a number of people. But when this whole issue, which  
4 you haven't gotten to yet, when Cindy tried to hijack our permit, Marissa was the first one  
5 that I started kind of talking to to get more information -- she was trying to help me by  
6 saying, Hey, let's figure this out.

7 Q Right.

8 A And was giving me direction. And then at some point, obviously, I was  
9 connected with other people, and then kind of the final person that we were dealing with  
10 was Amy Dailey.

11 Q Got it.

12 So that's actually -- so that's actually where I was heading to right now, or that's  
13 kind of next in the timeline. December 21st, we see Cindy Chafian e-mailing NPS to take  
14 the permit for herself.

15 How did you find out about this? I know you just talked about your  
16 conversations with Ms. Richardson, but how did you first become aware of this?

17 A Right. So two other important things to note were, again, back to Cindy  
18 with that Executive Protective Services with Chris, whoever, upset about finding out  
19 about that when they were going back over our billing and invoicing stuff.

20 And then also, found it very inappropriate that she was charging very expensive  
21 and inappropriate things to her room and saying that the organization was paying for it,  
22 for her sister, for her husband, just a lot of different things that she had no authority to  
23 make any of those decisions.

24 Q This is when I believe you asked her to start cc'ing you on expenses? Is that  
25 correct?

1           A    Yes, yes.

2           Q    Okay.

3           A    Because we got a hotel bill for her for an outrageous amount of money for  
4 food and then also for extending her stay when we told her that she needed to leave, that  
5 we weren't paying for another night for a hotel because there was no reason.

6               And then also, you know, we had meals that were either provided by another  
7 service, someone brought -- meaning like DoorDash, UberEats, something like that, or it  
8 was ordered through room service with the hotel that we were working with because of  
9 COVID, and it made things very difficult to be able to go elsewhere or get things delivered  
10 with the city lockdowns and all of that.

11              So if I'm, you know, in charge of an organization, and I'm paying for your meal to  
12 be delivered to you in the suite, I'm sure as heck not going to go and then pay for you to  
13 go and have another dinner with your husband and your sister in the hotel restaurant  
14 downstairs because you wanted private time.   Like, sorry, but I'm not doing that.

15           Q    So is this at the same time that you found out that Ms. Chafian was taking  
16 over the permit?   Is that when you found out?

17           A    So this is around, like, December 19th, 20 -- this leading up to Christmas.  
18 There was also a dispute that her sister's room charge was put on our bill, and I'm going,  
19 Absolutely not.   Why would I pay for your sister to come here?

20              And there were just numerous things that we were -- I was increasingly growing  
21 impatient with my mother and our chairman, as well as Jennifer, of why are we keeping  
22 her around when it's creating even more and more just havoc.

23              So we get to the West Coast.   We are there over Christmas and Christmas Eve.  
24 I believe that it was the day after Christmas -- so during this whole time, we would ask her  
25 things about the permitting process, like, where do things stand?   What do we need?

1 You know, just letting us know, keep us apprised of what's going on. And she would  
2 always be very cryptic or would not answer the question directly, whether it was via text  
3 or on the phone, would be, like, distracted, like, oh, you know, it was -- you know, we  
4 could never get a direct answer.

5 So she would say, like, I need to know when I'm coming back on the bus tour.  
6 And so basically what she was doing was trying to get a definitive date of when she was  
7 flying back out on the bus. And my mom just kept saying, She's not coming on the bus,  
8 but I really don't want to piss her off, for lack of a better way to say it, and to tell her  
9 you're not coming back on the bus because she's not being forthcoming with all of the,  
10 like, I guess, where the state of everything was, right?

11 Q Okay.

12 A Even though it had been at our direction, she had been purposely cutting us  
13 out of communications, and I was not catching onto it until afterwards because there was  
14 so much going on. We were again just, again, drinking out of a fire hydrant.

15 So when we got to Christmas, I believe it was the day after Christmas, I received a  
16 phone call from one of our vendors that said, I'm just really confused on what's going on.  
17 I was just hired for another event on January 6th at Freedom Plaza, but I'm hired for your  
18 event. So what's going on?

19 And I was very confused, like, I have no idea what you're talking about.  
20 Obviously, we have the permit, so anybody else who is hiring you for that doesn't have  
21 the permit, so it's kind of a nonpoint.

22 And continuing the conversation, it became clear that Cindy had taken the permit,  
23 changed it from Women for America First to just her name, and then went to basically all  
24 of our vendors and hired them out from under us and was planning to cut them out and  
25 include Ali and Alex Jones and was paid, I was told, 30 grand from Alex Jones to do all of



1 this.

2 Q Do you recall who told you that about Alex Jones paying her that money?

3 A I can't. I heard it multiple times, but I can't remember specifically of who  
4 said that.

5 Q Okay. And is it fair to say this is around the time you talked to  
6 Ms. Richardson, and you mentioned it earlier, it was, like, right after this Christmas period  
7 when you started --

8 A Yes. It was when whatever the next working business day that  
9 they -- everybody was back was the first time.

10 Q Would that have been on the 28th probably?

11 A That probably sounds about right.

12 [REDACTED], can we pull up exhibit 25?

13 BY [REDACTED]

14 Q And this is an email from Ms. Chafian to the National Park Service folks,  
15 including Ms. Richardson. And it actually -- I'll give you time to look through it because  
16 Ms. Chafian kind of gives her side of this permit issue that she was having with you all.

17 A Okay. I'm going to the put myself on mute and pause my video. I have to  
18 sneeze.

19 Q Oh, no worries, no worries.

20 [Pause.]

21 Ms. Kremer. Sorry guys.

22 BY [REDACTED]

23 Q No worries, no worries at all.

24 So I'm going to give you a second, and you can just let us know when to scroll  
25 down to read through this email from Ms. Chafian. And then I have just a few questions

1 so I can get your --

2 A So this is an email from Cindy to -- who is Debra?

3

4 Thank you.

5 Ms. Kremer. Deborah Deas. Oh, I remember -- I spoke with her.

6

BY

7

Q So this was the morning, I think, when stuff started to come to a head about  
8 the permit. So we have an email, which I know wasn't -- this -- we have it from Cindy to  
9 the folks you just saw. I'll give you a second to read through the email, and we have just  
10 a few questions just to get your perspective on it. So just let us know when to scroll  
11 down.

12

A Okay.

13

Okay. You can scroll down, please.

14

Thank you,

15

Ms. Kremer. Okay. Scroll down, please.

16

Okay. So what is your question?

17

BY

18

Q There wasn't a question.

19

So she says in here, Ms. Chafian says, right, that January 6th came up on the radar  
20 because of President Trump's tweet.

21

I believe you said -- your testimony earlier was that that's not true? Is that  
22 correct?

23

A Yes.

24

Q Okay. And your understanding was that your mother, or Ms. Hulse, or  
25 someone on the Women for America First board, was the ones that directed Ms. Chafian

1 to amend the permit, like it's not true, to your understanding, that she was doing it on  
2 her own? Is that fair?

3 A No. What's she trying to do is CYA and to try and convince, whoever, you  
4 know, Deborah Deas and Marissa and all of these other people, that she was in the right  
5 of what she was doing.

6 Q Okay. And I guess --

7 A But I know --

8 Q I know you talked to Marissa right after this, Ms. Richardson right after this.  
9 How --

10 A I might have spoken with Deborah Deas at some point too. I don't know  
11 the exact order, if I spoke to Deborah Deas first. I know that Marissa was kind of one of  
12 the main people that I communicated with prior to Amy Dailey, and not to say that  
13 anybody else wasn't helpful to me, it's just that Marissa was a little bit more helpful to  
14 say, like, let's get this whole story straight, you know.

15 Q Perfect.

16 So how did NPS resolve this issue? How did they get the story straight?

17 A It was changed back to Women for America First.

18 Q And how did you convince them? I guess, how did they end up -- to your  
19 understanding, like, what were you talking to them about for them to switch it back to  
20 your organization versus Ms. Chafian?

21 A Um, that it was obviously filed in our organization's name, and the permit,  
22 quote/unquote, belonged to, I guess, our organization, and she didn't have the directive  
23 or authority to amend that to take the organization's name off of it.

24 Q Did you coordinate or talk to anyone at the White House or the campaign or  
25 the administration when, I guess, going through this whole issue with this permit?

1           A    I don't believe so. I do think at some point I reached out to a friend of mine  
2 who worked at the Department of Interior, Elaine.

3           Q    Do you know Elaine's last name?

4           A    I'm drawing a blank. Can I look in my phone really quick and I can tell you?

5           Q    Oh, sure.

6           A    Hackett, I believe, but before I confirm that -- yeah, Elaine Hackett.

7           Q    Okay. And what was the nature, I guess, of the reach-out, if you recall?

8           A    That I just wanted to make sure, we were in such close of a deadline and  
9 with the holidays, with Christmas and New Year's approaching and then, obviously,  
10 COVID, with people not being in the office and whatever, that we got this situation  
11 quickly rectified because there were a lot of people that were investing time and efforts  
12 working on things, that I needed to know which direction we were moving, if we had the  
13 permit or not and to let her know what was going on to see if she could be of any  
14 assistance and who are the people that I need to talk to to kind of push this process  
15 forward, that I don't -- this can't turn into like a tit for tat, you know, let's wait and see  
16 how this all plays out when the event could have come and passed and -- and I can't  
17 remember if she did anything from that point. I think she just -- to the best of my  
18 recollection, I think she just said to continue working on the permit process. And,  
19 honestly, I can't remember what the significance of, like, what she said or did. I just  
20 know that I had to refile the permit. Marissa, I believe -- maybe it was Deborah Deas.  
21 One of the two of them had me refile the permit and then it was pushed in front of the  
22 other one. Because remember how I talked about the first permit that is put in? So  
23 then my permit under Women for America First went in front of Cindy's.

24          Q    Got it.

25                So also on December 28th -- and I know I'm throwing dates at you, like

1 December 19th and now we're December 28th, so the first business day after  
2 Christmas -- is when we see you specifically on behalf of the Women for America First file  
3 an application for the Ellipse.

4 Do you recall doing that on December 28th?

5 A So -- yes. So, and I believe at that same time I filed the other application as  
6 well for Freedom Plaza too. Is that correct; both of those?

7 Q Yes, Freedom Plaza and the Ellipse.

8 A Yes.

9 Q But the change that we saw was, like, really, this is the first time we're  
10 seeing the Ellipse put in the application.

11 A Right.

12 Q So just walk us through that, and then in particular, walk us through how the  
13 Ellipse even came on the radar of you all as a possible venue.

14 A So, obviously, not knowing what was going to happen with the Freedom  
15 Plaza permit application, right, I mean, I was being given every indication that things were  
16 going to be, quote/unquote, corrected, and that we would, again, have the permit back in  
17 our names. However, until we actually got that permit, I didn't know that we actually  
18 secured the permit, right?

19 So at that same time, discussions were being had with various people about the  
20 January 6th event and what can we do to have the, I guess, highest probability that the  
21 President would actually show up.

22 So Justin Caporale -- I don't know how to say his last name. I always butcher it.  
23 But Justin was someone that we had worked with previously. You know, he is a  
24 part -- or was a part of ESI. They had done the jumbotrons on December 12th and,  
25 um -- long story short, it was floated out, well, if we don't secure the Freedom Plaza

1 permit, it may be a moot point because, logistically looking at Freedom Plaza, if we're  
2 trying to set this up to have the most probability that the President comes, there  
3 probably is going to be an issue with Secret Service because of all of the surrounding  
4 buildings, and they may not like that location.

5 So from that point, just a dialogue was being had between Justin, myself, my  
6 mom, and, you know, various other people within our team about moving it to the  
7 Ellipse, if that were even going to be possible because, again, we're talking about a very  
8 finite amount of time.

9 So at some point it was made that -- the decision was made that the Ellipse was  
10 going to be the best place for us to file for the permit and let's go ahead and do Freedom  
11 Plaza and the Ellipse, and then basically, when push comes to shove, we'll have both  
12 places to be able to secure whichever that we want to or need to because, although  
13 we're speculating that Secret Service may have an issue with the surrounding buildings,  
14 they also may not, right?

15 But with ESI, they have done many events like this, not just for President Trump,  
16 but for other very high-profile people and elected officials. So I was kind of relying on  
17 their experience with saying that that could be a potential problem.

1

2 [1:49 p.m.]

3

BY [REDACTED]

4

Q I believe you mentioned Mr. Caporale. Just to make sure, it's -- the spelling

5

of his last name is C-A-P-O-R-A-L-E. Is that Caporale?

6

A I believe that sounds correct.

7

Q Yeah. So that's just to make --

8

A I think it's Caporale, but I know. Every time I read it, I want to say --

9

Q So, going back to that, then, you said there were discussions were being had

10

with people. You mentioned Mr. Caporale, your mother, I believe probably -- can you

11

just tell us who else was having the discussions about the Ellipse rally? Like, who was

12

involved in these conversations?

13

A Again, members of the March for Trump team.

14

Q Who are they? Like, who are the members?

15

A Anybody who was on the bus.

16

Q Okay.

17

A Anybody who was on the bus. I mean, there were numerous people that it

18

was probably floated out to just kind of get their feedback and thoughts on it, and I can't

19

give you any specifics of anybody that I remember a specific conversation or whatnot that

20

was had about it. It just seemed that, obviously, the Freedom Plaza permit was kind of

21

up in the air. Like I said, we didn't know if we -- even though we were given every

22

indication that we were going to be getting the permit, I didn't know until we actually

23

received that permit.

24

Q Was Ms. Pierson involved, Ms. Katrina Pierson involved in these

25

conversations?

1           A    I can't remember at what point Katrina got involved.  She -- Katrina has  
2    been a friend of ours for many, many years, back to the early Tea Party Days.  So  
3    possibly a conversation was had, but also possibly not.  It could have been a couple days  
4    later before she was ever pulled in into kind of a more official capacity, so to speak --

5           Q    Okay.

6           A    -- of trying to be kind of like a liaison, especially when the breakdown with  
7    Caroline Wren started happening.

8           Q    And, I guess, who first put the Ellipse as a possible place on the -- on your  
9    radar?  Was it Mr. Caporale?  Was it your mom, like you?  Who said, "If we can't do  
10   Freedom Plaza, let's do it at the Ellipse"?

11          A    I honestly cannot remember.  I mean, it was just like a natural,  
12   free-throwing -- free-flowing -- I'm sorry conversation.  Good Lord.  And, again, there  
13   would be conversations that were had with people that were on speaker phone, and, you  
14   know, my mom or I would walk out, in and out of the room, or, you know, Justin with his  
15   staff or whoever would walk in and out of the room, or they would conference somebody  
16   in.  There were numerous people that were, you know, trying to figure this out.  We  
17   just needed to make it work, make the best probability.  Everybody, I'm sure has read  
18   and has heard the President -- you know, that the President at the time was very specific  
19   on music that he liked playing, staging, lighting, all of that, so we wanted to ensure that  
20   whatever we were doing to set us up for success, that we had all of those elements in  
21   place.  In order to get those elements in place, we needed a backup plan for Freedom  
22   Plaza if we didn't get the permit or if Secret Service didn't like it.

23          Q    And we'll get to the coordination with ESI in a little bit.  But the goal at this  
24   point, right, on the 28th was to find an venue that would be conducive for President  
25   Trump possibly showing up.  Is that fair to say?



1           A     Right. And, also, just an alternative if we didn't get the official permit for  
2     Freedom Plaza, if Cindy was able to have made the change, and they would have said that  
3     that would have been okay.

4           Q     So was the plan at this point -- and I know I've asked this before. I'm going  
5     to ask you probably each iteration. Was there a plan to march to SCOTUS or the Capitol  
6     Grounds at this point when you were planning at the Ellipse?

7           A     I don't believe so because I believe before I filed those permits, the numbers  
8     that were used were as accurate and the best of my ability, and that is when I told you  
9     that I believe I was told by Marissa. I guess it could have been Deborah Deas, but I  
10    believe it was Marissa telling me specifically about the numbers and how, you know, you  
11    can't lie on an application like that even knowing -- which was a red flag to me because,  
12    clearly, she probably told Cindy that too.

13          Q     And this is because you all -- you -- when you filed this, you had put 5,000  
14    potential attendees for this permit, and then I guess the Capitol permit that we  
15    referenced earlier had 50. Is that what you're --

16          A     I'm just saying that at that point was the first time that I believe that I was  
17    made aware of the situation with the numbers and the COVID restrictions and how they  
18    were saying that it's an issue; you can't lie about this.

19          Q     Okay.

20          [REDACTED], can we pull up exhibit 7 again and go to page --

21          A     Wait. I want to make that -- I want to make a clarification here.

22          Q     Okay.

23          A     I'm not saying that I would lie on an application, but according to Cindy,  
24    when she was telling us, "I know that I put these false numbers down, but I was told to do  
25    that by Marissa or Deborah Deas," or whoever she was told.

1 Q Okay.

2 A So, when it was then explained to me, not by Cindy, I realized that, oh, red  
3 flag. Cindy was lying to me about that.

4 Q Got it.

5 A And I didn't like that in perspective of, you know, leadership of Women for  
6 America First; what sort of situation does that potentially put us in had something gone  
7 wrong?

8 Q Understood. Understood.

9 [REDACTED], can we pull up exhibit 7 and go to page 5527? And it will  
10 be --

11 [REDACTED] Sure. One second. Let me find it.

12 [REDACTED] No worries. The communication will be more at the top of the  
13 page.

14 Ms. Kremer. I'm going to sneeze again. One second.

15 [REDACTED] No worries.

16 Perfect. Right there.

17

BY [REDACTED]

18 Q Okay. So, Ms. Kremer, it looks like -- and this is all on December 28th still.  
19 It looks like, at 2:10 p.m., you're talking to your mother, and it looks like it's about I'm  
20 presuming the permits. You say to her: Ms. Kremer, Ms. Amy Kremer, you have only  
21 spoken to NPS, correct? I just want to make sure before I call MPD and SCOTUS.

22 Do you recall what you were calling MPD or SCOTUS about around this time?

23 A Not specifically. I know that I was in communication with a lot of them to  
24 try and understand the whole permitting process specifically because, although I had  
25 worked on different permits in the past, I was never officially -- under my sole -- I guess

1 my sole actions had ever completely filed a permit on my own where I didn't have some  
2 sort of input or direction or advice from other people.

3 And there were a lot of different agencies I know that Cindy was communicating  
4 with and that there were, you know, numerous Zoom calls that I had offered to be on  
5 that now, in hindsight, obviously, she didn't want me on them because of what she was  
6 doing, but that I, you know, would offer, and she would always say, "Oh, no. I've got it."  
7 She was, like, "This is so easy for me because I've done this so many times now," which,  
8 again, that goes back to the reason that my mom wanted to keep her on because that  
9 wasn't another piece of the puzzle that -- it would just -- we could obviously do it, but it  
10 would take us a little bit longer because we're not as familiar with the process when that  
11 was her role. That's -- that's what she was doing at our direction.

12 Q Right. So that's going to take us, then, to -- and before I get to this, I'm  
13 going to move on to the first issued permit.

14 [REDACTED] [REDACTED] or anyone else have any questions before?

15 So exhibit 28, [REDACTED], is the first issued permit that you all received on January 1st.  
16 And once you pull it up, [REDACTED] I'll direct you to -- so you can scroll slowly just so that Ms.  
17 Kremer and Mr. Warrington can see that this is the permit, the public gathering permit  
18 from the Department of the Interior.

19

BY [REDACTED]

20 Q And then, at the top of page 2 is where I will -- so the activity overview, right.  
21 So it gives an overview that Women for America First will conduct and organize -- will not  
22 conduct and organize a march from the Ellipse at the conclusion of the rally. This is in  
23 the middle of the paragraph.

24 A Uh-huh.

25 Q Some participants may leave to attend rallies at the United States Capitol to

1 hear the results of congressional certification of the electoral college count.

2 Where did NPS get this information to include in the permit? Did they get it  
3 from you?

4 A I don't know if it was on behalf of us, meaning Women for America First, if  
5 that's something that Justin put in there because he was helping fill out all of this or if it  
6 was something that NPS put in there. But, to my recollection, it coincides with exactly  
7 what I was saying, was once we understood that there could be implications, legal  
8 implications to doing a march when we knew that more than 50 people or 500 or  
9 whatever the capacity because you also have to remember the different areas with  
10 whatever they're overseeing organization had different requirements.

11 Now, you would think that it would just be a blanket across the board, that what  
12 happens at Freedom Plaza could happen, you know, 500 yards down the street, but that's  
13 not how it all worked out. So that was when the decision was made that we would not  
14 be hosting an official march anywhere that was under Women for America First.

15 Now, what other people decided to do, that was on their own thing. Like, other  
16 people had had events on December 12th that were not under the Women for America  
17 First umbrella with a different permit. So I think that that's probably why that was put  
18 in there.

19 Q I'm going to jump ahead a little bit, but help me understand, then, why  
20 Women for America First, I believe you all had a stage at the Supreme Court for January  
21 6th just like you did in December and November. So I'm hearing your answer just now,  
22 but help me understand --

23 A Right.

24 Q -- why you set up a stage.

25 A So that definitely skips a lot of what needs to be discussed here for you guys

1 to get the full picture, but I guess a short answer that I can explain a little bit later is that  
2 when the President basically tweeted out and confirmed that he was going to be there on  
3 January 6th, it threw out any speaker that we had because the President at that point was  
4 making -- going, obviously, to be making the decision of who was going to speak that day,  
5 right. We hoped that it would be members of our team and people that we had had  
6 previously along the March for Trump tour and then also at our two previous big rallies.  
7 But at the end of the day, whatever accommodation, you know, the President wants for  
8 him to be able to speak there, we're going to probably have that person speak.

9         There were a number of people that were very upset that they were being kind of,  
10 quote/unquote, cut out of the process, from their perspective, a lot of dissension  
11 between the different groups and slanderous things being said about appropriations of  
12 money and people trying to be in control. And so, when all these conversations are  
13 being said, people within our own March for Trump bus tour team -- and when I'm saying  
14 that, I'm saying that loosely of, like, even people that just, you know, spoke at a previous  
15 rally of ours or whatnot -- were hearing things like this and started kind of aiming their  
16 arrows at us and saying, like, you know, "Kylie's in Washington, D.C., being a diva,  
17 controlling everything; you know, this wouldn't have happened if Amy was there," and  
18 basically painting it out to be that I was solely taking, you know, control and saying -- for  
19 instance, he's not the only one, but just for a specific person, let's say for the situation,  
20 Dustin Stockton, you know. Dustin took it very personally that he was probably not  
21 going to be speaking on January 6th and convinced himself that I was cutting him out.

22         So, when that started happening with different people, Diamond and Silk, David  
23 Harris, Jr., Mike Lindell, we wanted all of our people that had been with us on the March  
24 for Trump and on our previous rallies and who had been a support system for everything  
25 that we had been able to accomplish that far, that we wanted a platform for them to be

1     able to speak.

2             Now, you have to also realize at this point where I'm, like, backing up, we were  
3     still working on both permits moving forward, Freedom Plaza and the Ellipse, and it was  
4     not until kind of like a last-minute thing that I was put a lot of pressure on by NPS, which I  
5     understood that I could not keep both permits.    Because at that point, I wanted to keep  
6     both permits, even though we were moving forward with the Ellipse and that was the  
7     main event, but I wanted to keep the permit at Freedom Plaza just, like, to make sure that  
8     Cindy Chafian and Alex Jones and Ali do not get this permit.

9             And that was because of a number of different reasons, but one of them also was  
10    because we didn't want to have, quote/unquote, bad actors or agitators that they were  
11    frequently talking about, communicating with, that, you know, we had seen through the  
12    press, whether it was Proud Boys, the 1AP people, all these people that kind of being like  
13    whack-a-moles that I kept feeling like we kept, like, smacking down, but then, you know,  
14    birds of a feather flock together.

15            So then all the crazies started flocking together, and I didn't want them to have an  
16    event, and this wasn't just a sole conversation that was had with me or my perspective.  
17    Collectively, we didn't want them to have an event that distracted from actually the  
18    more, you know, I guess level-minded, more just straightforward groups that didn't have  
19    ulterior motives or what appeared to be ulterior motives taking away from our event that  
20    was going to be taking place at the Ellipse and, you know, again, to ensure the highest  
21    probability that the President would, in fact, show up.

22            Because you have to realize, we could be doing all of this, jumping through hoops,  
23    assuming that Secret Service could have an issue with the buildings around and whatnot,  
24    but until that President or that person walks on that stage, I didn't have any confirmation  
25    that he actually was going to walk on that stage, right.    He could have decided the

1 morning of, even after having confirmed with whoever needed to confirm it that he could  
2 have changed his mind and been, like, "Nope, I'm not doing it."

3 Q Right.

4 A So, when all of this was going on and I was pushed to that permit because  
5 the Ellipse permit was so much more indepth than the previous permits for the Freedom  
6 Plaza area, I was basically pushed by them, like, you need to let this permit go. And that  
7 is when Caroline Wren, Justin, my mom, numerous other people, Jennifer Hulse, people  
8 within Justin's team, people that worked for Caroline basically, like, calmed me down and  
9 said, like: I promise you it will all work out. We need to let the crazies have a platform  
10 the day before so that we can control the narrative as best that we can for January 6th.  
11 Like, let them have their moment on January 5th. Let's then -- do whatever they're  
12 going to do at Freedom Plaza, and then January 6th will be Women for America First and  
13 the President, like, no other groups involved.

14 We put up the other stage on January 6th at the Supreme Court. That was kind  
15 of like a bid to the people that were getting very frustrated and upset that there was no  
16 longer a platform for them to speak on the 6th, but if they made their way down to the  
17 Capitol and wanted to speak there, that there would be an opportunity, but that we were  
18 not doing an official march. We were not having security take them down there, you  
19 know, anything like that, but if they were hell bent, for lack of a better way to say it, that  
20 there would still be a platform because there was a sea of, you know, MAGA supporters  
21 everywhere, that there would certainly be an opportunity for them, should they choose  
22 to make that endeavor on their own.

23 Q So --

24 A Does that make sense? I know it's a long --

25 Q Oh, no worries, yeah. Thank you.

1           Going back, though, to December 28th, I just have a few more questions, and  
2   thank you for kind of --

3           A     Okay.

4           Q     I know we got a little head of ourselves in the timeline.

5           A     And there's certainly things that I need to fill in to make that all make sense,  
6   but hopefully, that kind of answers --

7           Q     We'll take it chronologically, so you'll -- we'll get there.

8           You discussed -- it seems like from your messaging that you really want the  
9   marching to not be -- the marching from the Ellipse or Freedom Plaza to the Capitol as  
10   part of the application, it looks like you fear you might lose your permit, right? Is that  
11   what you were thinking about at the time, that you might lose your permit from NPS --

12          A     Right.

13          Q     -- around this time?

14          A     And to my best understanding was maybe because of how big our two  
15   previous events had been, maybe at some point they decided to come down harder on  
16   the restrictions and enforcing actually what the permit numbers were. I don't -- I don't  
17   know, but I just know that basically, like, the fear of God was put into me by whoever that  
18   we couldn't have the permit to march because we willingly would be lying on the  
19   application, knowing that more people would be there, and that would put in jeopardy  
20   what we were doing for the Ellipse.

21          [REDACTED] Okay. You can take that exhibit down, thank you, [REDACTED]

22          Anyone have any followup there before I move on?

23          Okay. [REDACTED] do you mind pulling up exhibit 12? These are the messages with  
24   Mr. Mike Lindell.

25          It looks like, [REDACTED] you might have some followup.



1 [REDACTED] Sorry. Really quickly, I did. I was, like, scrambling with the control  
2 bar. Nightmare. Apologies.

3 BY [REDACTED]

4 Q Really quickly, [REDACTED] and I -- [REDACTED] if you're going to get to this, cut me off  
5 and we can come back to it.

6 But I think you mentioned earlier there were discussions with Secret Service, and I  
7 just wanted to check and see. Did you personally have any interactions with Secret  
8 Service regarding the planning of either January 5th or January 6th?

9 A No, but I also didn't say that there were conversations. I said that there  
10 was a potential that they would have had an issue with that, and I was relying on Justin  
11 and other people at ESI to kind of make that directive. I mean, I had never worked with  
12 Secret Service previously, so how would I have known that that was even something to  
13 think of? That wasn't my wheelhouse.

14 So, you know, a vendor that had experience in this that, you know, was giving that  
15 kind of directive, that this could be an issue here based on things. Well, when I was told  
16 that, that makes a lot of sense logically that that would be an issue.

17 Q Yeah. No. And I understood what you were saying, that, to the extent it  
18 came up, your understanding was that Justin Caporale was dealing with it. I just was  
19 checking. You personally did not have any interactions with Secret Service?

20 A No.

21 Q Thanks.

22 [REDACTED] [REDACTED] can we pull up the Mr. Lindell text messages, exhibit 12,  
23 and page -- I'm pretty -- know where I'm going. There you go.

24 BY [REDACTED]

25 Q I know this jumps ahead of where we just were, Ms. Kremer, so I'll give you a

1 second to read this message, the longer one that you sent Mr. Lindell on January 4th of  
2 2021. The part that I'm going to ask you specifically about is where you say: This stays  
3 only between us. We're having a second stage at the Supreme Court after the Ellipse.  
4 POTUS is going to have us march there, the Capitol. It can also not get out about the  
5 march because I will be in trouble with the National Park Service and all agencies, but  
6 POTUS is going to call for it -- in quotes -- it looks like, unexpectedly. Only myself and  
7 Katrina know full story of what is actually happening, and we're having to appease many  
8 by saying certain things.

9 So the first question is, how did you know that President Trump was going to have  
10 people march to the Capitol after his speech at the Ellipse?

11 A Okay. So it is important, again, to realize back of what I was trying to  
12 explain that there was a lot of misinformation going around and a lot of dissension that  
13 was creating issues with people that we had, you know, partnered with, that had been  
14 supportive of our tour, had been speakers on our tour. And some of the things that  
15 were being said, like to Mike Lindell in this instance, were trying to be damage control, to  
16 make him not feel like he was being cut out from January 6th at the Ellipse, just how I  
17 talked about Diamond and Silk and Dustin. There were numerous people that felt like:  
18 Oh, really, you know, we've been here the whole time supporting all of these efforts,  
19 going on the bus tour around the country, at the previous two events, and now you're  
20 just going to push me to the wayside? Because that was never any of our intentions.

21 Now, I do know that it was being readily talked about between a lot of different  
22 people, including with NPS, that there were other events being set up at other permitted  
23 locations, which became an issue because it kept telling them Ali has someone else filing  
24 for a permit, and that's a problem. He's a convicted felon. All of this rhetoric, all of  
25 these different things where he's tried to have hostile takeovers of events and whatnot,

1     you guys need to be aware of that.   And I could never figure out what sham organization  
2     was being, I guess, put the thing under.   Now I've learned that it's, like, One Nation  
3     Under God or something like that.

4             Basically, all I was able to be told was, like, yes or no answers to questions.   So,  
5     because I did not know the exact person's name who filed for the permit or because I did  
6     not have the organization, that they could not connect the dots specifically but that they  
7     were all aware of that, and they kept assuring me that Ali was not a part of any of this.  
8     I'm, like:   I know that you're telling me that, but I know otherwise because of what I'm  
9     being told by people that are, you know, mutual friends of ours.

10            Q     Okay.   I think the -- I think that's actually a great place for me.   I guess my  
11     question I'm trying to just wrap my mind around is, if you know that President Trump is  
12     going to send people from the Ellipse to the Capitol, why aren't you advertising it, or why  
13     does it have to be kept behind, like, kept a secret?   Why is it a secret?

14            A     Because -- right.   Because I -- I, we, Women for America First, are not  
15     responsible and giving people the directive to go and march.   People are able to do  
16     whatever they want.   So, if they want to come to the Ellipse and come to the event that  
17     is presented by Women for America First and then they want to go to an event with, let's  
18     say, Jericho March or "Stop the Steal" or whatever, people are free to make their own  
19     decisions.   And that was a conversation that had continuously been had with NPS, that  
20     other events were being permitted and that we could not control any sort of, you know,  
21     when do you leave, when do you stay because that was something that was discussed  
22     about an exit plan, right, of how do we talk -- or how do we plan to get all of these people  
23     that are coming to D.C., what is the plan for them to leave?

24            And so that was something that was confusing in the process to me too.  
25     Wouldn't it make it easier if there was a permit to march because then things could be

1 more controlled? There could be more law enforcement, and NPS and whoever these  
2 different agencies that I was speaking with, both on Zoom calls and then also individual  
3 conversations that were being had, it did not make sense to me. But I was being  
4 continuously told by NPS that we could not have a permit to march, and if we did or  
5 promoted a march, then the Ellipse permit would be revoked, or we would not officially  
6 get the final one.

7 Q Perfect. So but then, aren't you trying to -- and correct me if I'm wrong,  
8 but you're trying to, like, make Mr. Lindell feel better here where you're, like: Hey, look,  
9 you're not being cut out of the Ellipse.

10 I'm reading this as, in fact, POTUS is going to send people to the Capitol, and that's  
11 where we'll have our SCOTUS stage set up just like we did in November and December.  
12 Tell me where I'm wrong with that kind of interpretation of this message.

13 A Well, so my, I guess, viewpoint on this is that I don't know where you are  
14 physically, but if you're in the D.C. area and, you know, January, it was really cold, and  
15 just -- like, it was just miserable. So, number one, I knew that the probability of getting  
16 our people, especially kind of more, quote/unquote, high-profile people, they're not  
17 going to be trekking the mile, mile and a half down to the Capitol or the Supreme Court  
18 when it's so cold. You're sitting out there for hours because our event started at 8 a.m.  
19 It wasn't like our other events that started later on when it was sunnier.

20 And then also the amount of people that just kept coming and coming in every  
21 single direction. I mean, there was no logistical way that you were ever going to make  
22 any sort of time to get there, collect your thoughts, and have a speaking -- your head on  
23 right to be able to speak, if that makes sense. Like, to be able to calm yourself, collect  
24 your thoughts. I knew that none of that was going to happen.

25 So I guess what I'm trying to say to you is that, again, this was a way to kind of try

1 and appease Mike of saying that, like, we're working on an alternative plan B, but, again, I  
2 don't have the final speaking schedule. So that was also signaling to him that you could  
3 potentially still be on the speaking schedule at the Ellipse, right, when the President  
4 makes that final decision by close of business today on the 4th, but I didn't even have  
5 what the speaking schedule was until the night of the 5th, leading into the 6th.

6 Q Okay. And one last clarification: How did you know that President Trump  
7 was going to send everyone to the Capitol? Like, how did you become aware of that  
8 information specifically?

9 A Again, it was just people were talking about it on social media. A lot of the  
10 information that I was getting was through social media and also knowing and working  
11 with the different agencies about how these other events were happening, that he  
12 wanted -- from the things that he had retweeted and been doing gave every indication  
13 that he wanted to be big tent just as we had been at the two previous rallies in November  
14 and December.

15 So I didn't know that specifically, but knowing how he is, very off the cuff -- I've  
16 never met the man, but everything that you see from not only his social media accounts  
17 but also how he speaks with press or does very impromptu things, that's not out of the  
18 realm for him to go: Okay, now go ahead and walk down there. I mean, you know, he  
19 even said in his speech that he was going to walk down there, and then he didn't.

20 So that is just all of what I was saying in that is that I'm sure that he's going to do  
21 that because the whole intention of the January 6th event at the Ellipse was to then turn  
22 all eyes on to the members that were in the joint session to prevent -- to present the  
23 evidence that the American people could hear about the election without the filter of,  
24 you know, the national media that had been distorting so many facts up until that point.

25 [REDACTED] Thank you, [REDACTED] We can take down the exhibit.

1 Is there any followup from anyone else before --

2 Mr. Warrington. Yeah. Can we actually put that back up?

3 [REDACTED] Oh, yeah. Sorry about that, [REDACTED] I spoke too prematurely.

4 [REDACTED] No problem.

5 Mr. Warrington. And, actually, [REDACTED] I think that's uploaded, that exhibit  
6 again. Oh. Exhibit 12, version 2, that came up before I was able to read it has  
7 disappeared now.

8 [REDACTED] Okay. I will see if I can just email to you if it's --

9 Mr. Warrington. Yeah. That -- that's fine, man. We've got it, but just to try to  
10 keep things in --

11 [REDACTED] Yep. Yep.

12 Mr. Warrington. -- in line here.

13 [REDACTED] I'll do that now.

14 BY [REDACTED]

15 Q So, Ms. Kremer, looking at this long text message from you to Mr. Lindell, in  
16 that second paragraph there, you wrote: POTUS is going to have us march there/the  
17 Capitol. "There" meaning the Supreme Court. And then you write --

18 A Right. Just general vicinity.

19 Q Okay. And then, in the next paragraph, you write: It can also not get out  
20 about the march because I will be in trouble.

21 And you've explained what you mean by that. Are you saying that you thought  
22 the President was going to send people to the Capitol because of what you saw on  
23 publicly available social media?

24 A What I'm saying is that, obviously, November and December kind of set a  
25 track record or pattern of the way that people that were gathering in D.C. expected for

1 the events to go. They expected to go from one location, to march down to a second  
2 location. It says in there about the second stage about trying to sabotage it, which  
3 again, I explained back earlier --

4 Q Yeah. I understand that, and I'm not -- I'm just trying -- I'm asking a very  
5 specific question.

6 A Right.

7 Q -- which is --

8 A And I'm trying to answer --

9 Q This idea of.

10 A When I talk --

11 Q All right. Let me just make sure. We can't talk over each other, so -- and I  
12 know I interrupted you, but I just wanted to avoid having to talk around the point.

13 You said, I think, that -- when [REDACTED] asked you, how did you know the President  
14 was going to send people down to the Capitol, and I think what you said was it was just  
15 something you had picked up from his -- from postings and from social media.

16 Is that a fair sort of characterization of how you put it?

17 A So, before I was interrupted, what I was saying about it being sabotaged was  
18 that there's no permit that is allowed to be had for the Supreme Court -- I mean, at the  
19 time. I don't know if that's changed. So, when I was talking about the pattern that  
20 was being set from November and December of that's the way that the was crowd was  
21 moving, following our direction in November and December, it was very safe to assume  
22 that something similar was to be expected in D.C., which goes back, again, to why I could  
23 never understand why the Park Service and, you know, these different agencies are  
24 putting so much pressure on me about not being able to have a permit. Because if we  
25 could have had a permit to march, it seems that that would have been a situation that

1 would have created a lot more control than what actually happened on January 6th.

2 So, when I'm talking about that and saying about social media, it's not specifically  
3 from Trump social media that the President and/or his staff were tweeting out. It was  
4 social media of people from anywhere talking about what had previously happened.  
5 Obviously, there was going to be a joint session in Congress. It doesn't take a rocket  
6 scientist to figure it out, if the first event is at the Ellipse, that they're going to go to the  
7 second location, putting pressure on Members of Congress to say: Hey, we're here.  
8 We're watching. I mean, the fact that this is news that NPS and everybody else were  
9 putting pressure on me, saying there should be no marching, I mean, I had this  
10 conversation with them multiple times. It was obvious what was going on --

11 Q Ms. Kremer --

12 A -- and that people were going to go and leave.

13 [REDACTED] I don't want to interrupt you. Oh, sorry.

14 Go ahead, [REDACTED]

15 [REDACTED] So I understand, whether it was -- my point is that you were saying  
16 your understanding, assumption, knowledge, the basis for you saying that there was  
17 going to be a directive or instructions or whatever you want to characterize it as, the basis  
18 in this text message, as you explained it to [REDACTED] was publicly available information.  
19 Is that right?

20 Mr. Warrington. And let me interrupt here because I -- maybe I couldn't -- what  
21 she's saying is two things. There was a past history of events like this that was in the  
22 context and that what she saw on social media was consistent with that context, and she  
23 drew that conclusion. I think that's the -- I think that's what she said. I think that's  
24 clearly what she said.

25 BY [REDACTED]



1           Q    Okay.  So, if that is the case, then why is there -- I get the sense from the  
2   text message that you're telling Mr. Lindell that there's something about this plan that  
3   cannot be made publicly known, right?  Where you say it cannot get out about the  
4   march because you're concerned about getting in trouble with the Park Service, so --

5           A    Right.  So --

6           Q    I don't understand the distinction between what people's expectations were  
7   based on the previous march, which certainly the Park Service knew about, and what may  
8   have been spoken about generally in the atmosphere about January 6th, which the Park  
9   Service certainly had access to --

10          A    [REDACTED]

11          Q    -- and putting that against the idea that we can't tell people about this  
12   because I'll get in trouble with the Park Service.  I'm not trying to be accusatory.  I'm  
13   really genuinely trying to understand.  What was the secret to be kept if it was based on  
14   publicly available information?

15          A    [REDACTED] That's how you say it, correct?

16          Q    Yes.

17          A    So, before I was rudely interrupted, which is why I was trying to lay the  
18   groundwork to answer this question because I know that you are trying to get there is  
19   because, again, there was not a permitting process for the Supreme Court.  So, when a  
20   stage was put up there, it was first come, first served.  So, at the previous events, I  
21   would have to go back and find out, but it was, I believe, in the middle of the night when  
22   we had a team that went out there and erected a stage so that another group couldn't  
23   get there and put up another stage, and then we didn't have a spot.

24                So my whole thing is that, again, going back to it can't get out, I don't want  
25   somebody putting up a stage there, and then we're SOL, and the people that I'm trying to

1 say, there's another platform for them to speak, then get there, and then I don't know  
2 whoever has the stage that's being put up there or have control over the, you know,  
3 portable sound system that is there.

4 So you're trying to conflate the two sentences instead of taking the whole thing  
5 for factually what it is about the permitting process and how there is not a permit for the  
6 Supreme Court, and that is a very clear distinction that there is a first come, first served  
7 situation, which we also dealt with when talking in -- about November and December.  
8 There was a very clear distinction that it was a much smaller stage, a much smaller scale,  
9 all of these things. And there was never a permit for the Supreme Court at any three of  
10 the events.

11 Q So I have one more question. Why is the word "unexpectedly" in quotes in  
12 this text message?

13 A The word "unexpectedly" is because he does things very off the cuff and  
14 unexpectedly. I mean, it was not a secret that he was obviously going along with a lot of  
15 crazy things that people were tweeting and saying and doing that then would be deleted,  
16 or he would say, "Now I have new information," or whatever; he would be given more  
17 things. But, you know, that was a problem, I think, that everybody from the outside, at  
18 least, was looking at, that sometimes he wouldn't have the full picture of what was going  
19 on on social media, and it would create a little bit of just misinformation about that, I  
20 guess. So, I mean, it's the President of the United States. When you're expecting  
21 anything, I think the unexpected is what to expect.

22 Q So, if I understand this, you say it's -- you put unexpectedly --

23 A Right.

24 Q -- because it was what you expected from the President?

25 A Yes, because I knew that other groups were erecting events around the

1 Capitol based on my conversations not only with the Park Service and the  
2 different -- other different agencies but also what I was seeing on social media. And,  
3 again, everybody was trying to be inclusive and bring everybody under the same umbrella  
4 as far as getting the messaging out because Big Tech had been censoring everybody.

5 Q So let me ask you just a couple of questions that I -- I'm just trying to distill  
6 directly, and you can answer yes or no, and then I'll let you explain if you want to, but  
7 hopefully just a yes or no.

8 A Before you ask these questions, can I take a break for a minute?

9 Q Sure.

10 A Okay.

11 [REDACTED] It's 2:35. You need 5 or 10? Let us know.

12 [REDACTED] Can we make it 10, actually?

13 [REDACTED] Yeah. Let's come back at 2:40.

14 Ms. Kremer. Thank you guys.

15 [Recess.]

16 [REDACTED] I believe [REDACTED] was continuing with some questions with you,  
17 Ms. Kremer.

18 Ms. Kremer. Thanks for the break.

19 Mr. Columbo. Can we interject for second? This is Mike Columbo. I sensed a  
20 little bit of frustration on both sides and thought maybe folks were talking past each  
21 other just a little bit. And I just wanted to offer an observation, maybe help, you know,  
22 kind of smooth things over and clarify or maybe put them on track so you can follow up, if  
23 necessary.

24 In looking at the text, there's a couple of different points that are being made in  
25 the text, and maybe the questions and answers got a little cross wired in terms of

1 matching up questions to the answers. But what I heard, you know, and feel free to  
2 disagree or follow up, was that Ms. Kremer was aware the President may ask for people  
3 to march on the Capitol. And although she told someone about that, she's also  
4 reluctant and in tension, I guess, if you will, because it's not her organization's march, and  
5 she doesn't want to be seen as her organization or her saying it's her march or her  
6 organization's march. The organization doesn't have a permit for the march, and there  
7 was some testimony earlier about that.

8 So I think -- I don't know if that helps clarify, but she's aware the President was  
9 expected, and you can never know what he's really going to do, but she expected him to.  
10 She shared that information. I think she's trying to be careful, reasonably, that it's not  
11 her organization's march.

12 Does that does that help clarify or make things a little bit more sensible?

13 [REDACTED] I think that's helpful, Mike, but not directly responsive to maybe  
14 what we were trying to get at with respect to that specific part of the text message. So I  
15 can just be more direct about it, I guess, with Ms. Kremer.

16 BY [REDACTED]

17 Q So, Ms. Kremer, we know that Katrina Pierson spoke with folks at the White  
18 House, including Mark Meadows, on January 2nd, which is 2 days before the text  
19 message we are looking at that you sent to Mr. Lindell, about the President's participation  
20 in the Ellipse rally. We know that she received guidance about what the President  
21 hoped would happen at the Ellipse rally. And we know that that guidance included that  
22 the President wanted to send people from the Ellipse to the Capitol. In that text  
23 message, you say, "only me and Katrina know the real plan or know the truth about what  
24 we're trying to do."

25 So, when you say that the President is going to announce unexpectedly,

1 encourage people, in quotes, "unexpectedly" to go down to the Capitol, that's because  
2 Katrina told you that, right?

3 A No.

4 Q So Katrina never told you that the President had hoped to send people to  
5 the White House before you sent this text message to Mr. Lindell?

6 A I -- to my best recollection, I do not believe that that specific directive was  
7 told to me via Katrina.

8 I will say something else that we have not yet gotten to is regarding the other  
9 person in this whole equation, which is Caroline Wren, which was creating a lot of other  
10 dissension and chaos surrounding all of these events with where she was, from my  
11 perspective, putting money and funding these other groups to hold these other events  
12 and things, that directives were being given by people that had no authorization to make.  
13 And so it was a reasonable assumption to assume that the President was going to be  
14 making a very similar directive to the pattern that was already established from one  
15 location to the next and that that's the way that things were going to be moving forward.

16 But, as far as our organization went, we were not giving a directive of that, and we  
17 were not having a role in any of that. What anybody else did, we can't control. We  
18 can only tell them what, you know, our perspective is, what we've been told by the  
19 different agencies and Park Service and that sort of thing, but that doesn't mean that it  
20 becomes everybody else's reality.

21 Q Are you saying Caroline Wren told you that the President was going to send  
22 people to the Capitol?

23 A No. But what I'm saying is that Caroline Wren was trying to create a public  
24 narrative from other organizations. And I believe that there was a robocall that at the  
25 time I was not aware of, but I've now been since made aware of that I think gave a

1 directive and even mentioned Women for America First name in it which was not  
2 accurate. She was also leaking things that were not accurate to the press. And, in my  
3 perspective, it was a CYA for herself because she was accepting a lot of money and  
4 funneling it to various groups that should have had no role on anything because of their  
5 fringe-like qualities and the rhetoric that they had been spewing.

6 And so there was a lot of dissension that was created by Caroline Wren, that we  
7 were having to basically do damage control and to try and keep players in our corner, I  
8 guess for lack of a better way to say it, but, like, to appease them, right. I'm not going to  
9 go and tell Mike Lindell or Diamond and Silk or Sebastian Gorka or David Harris, Jr., any of  
10 these other people: You're not important. You've been there with us from the  
11 beginning and supported all of our efforts, but you're not important enough to have a  
12 place to speak because the President is now involved. Obviously, no one thinks that  
13 they're the President, but to say something in that brunt and forceful of a way when  
14 Caroline is going around saying that we were the ones that cut everybody else out, which  
15 was totally inaccurate, or the President made that decision, it was trying to do it in the  
16 most delicate, diplomatic way to explain kind of the chaos surrounding the event.

17 Q Okay. So this is a yes-or-no question. Did any person tell you in advance  
18 of this text message you sent to Mr. Lindell that the President was going to direct people  
19 to go to the Capitol?

20 A Not to my recollection.

21 [REDACTED] [REDACTED] do you have any questions?

22 [REDACTED] I did. Just a couple followup. Can we put the text back up there?

23 [REDACTED] Sure.

24 [REDACTED] I just wanted to get some clarification on a couple things that was  
25 specific to the text.

1 [REDACTED], can we zoom in?

2 Ms. Kremer. Thank you.

3 [REDACTED] Yeah. My eyes are terrible too.

4 BY [REDACTED]

5 Q Ms. Kremer, in the paragraph that says, that we've largely been talking  
6 about: It can also not get out about the march because I will be in trouble with the  
7 National Park Service and all the agencies.

8 What other agencies other than the Park Service were you referring to there?

9 A When I did these Zoom calls, there were numerous different agencies,  
10 whether it was D.C. Metro Police, Supreme Court Police. I mean, there were a lot of  
11 different representatives that were being looped in with all of these conversations, and I  
12 think that I referred to them in a general way here because I don't, still to this day, know  
13 exactly how to qualify or quantify exactly who was on these calls and what organizations  
14 or entities they were representing.

15 Q So is it fair to say that, at the time that you wrote that, National Park Service  
16 and all the agencies, you were referring to all of the agencies that were on these planning  
17 calls in preparation for the event?

18 A Yes, and individual phone calls. I believe that there were a couple that  
19 were had with individuals off of the main Zoom calls.

20 Q Okay. And, during any of those calls, was there any discussion ever about  
21 people believing that the President of the United States would encourage the attendees  
22 to march to the Capitol?

23 A Yes.

24 Q Which call?

25 A I'm not sure, but it goes back to, again, not knowing that -- the way to expect

1 anything from the President would be to expect the unexpected. Just like, on some of  
2 these calls, I was continuously asked, how do you know that the President is coming?  
3 Well, because he publicly tweeted it. Had I had any direct communication that he  
4 actually was coming? No. Had there been talk of it that had kind of, you know, gotten  
5 around and people speculating he had done the drive by Freedom Plaza in the beast and  
6 then had done the flyover, obviously that was the intention of why --

7 Q Well, let me -- I'm sorry. I don't mean to interrupt you. No, no. I -- I  
8 misstated my question, and that's on me --

9 A Okay.

10 Q -- so I apologize.

11 A Thank you.

12 Q Let me rephrase my question so it's more clear.

13 On the calls that you had with the agencies, I want to make sure that I understand  
14 that you're saying that there was discussion amongst those agencies that they believed  
15 that the President was going to instruct people to march after the event to the Capitol,  
16 that there was planning discussions around the President instructing people to do that?

17 A Yes. That's what I'm saying, that I don't know if it was specifically on the  
18 calls that were all of the agencies together that were playing in this or if it were individual  
19 phone calls that were being had with either myself, Justin, Jennifer, but that we knew to  
20 expect the unexpected, and it goes back to, again, a question that I continuously had. If  
21 there were other events that were being permitted, why would there not be a permitted  
22 march to another location that it seems like that, from my perspective, would have given  
23 the most control to any of the law enforcement agencies, which we were trying to  
24 obviously work with and appreciate all of their hard work to make everybody safe. And  
25 it seemed like there was just no -- it seemed like it was very consistent that there was just



1 not going to be a march despite what had previously happened at the other rallies that  
2 were permitted and then also against every indication of things that were being talked  
3 about on social media and personal conversations that I was a part of with them.

4 Q Okay.

5 [REDACTED] We can take down the exhibit.

6 BY [REDACTED]

7 Q So, going to the numbers of folks that are going to be attending the rally at  
8 the Ellipse, I believe you all -- and by "you," I mean you and Ms. Hulsey -- increased the  
9 numbers on January 4th as well. So I believe Ms. Hulsey increased the number of likely  
10 attendees to 20,000. You increased it the same day later on in the day to 30,000. Just  
11 help us understand how you all got those -- received those estimates or developed those  
12 estimates for how many people were going to come.

13 A Justin would be able to probably give that answer more accurately. I  
14 believe that Justin --

15 Q Justin? Is it that you just received those numbers from Justin Caporale?

16 A I believe that that's -- I believe that that's where that came from, along with  
17 conversations that I was a part of with Amy Dailey and making sure that the proper  
18 medical staff requirements and Porta Potties and all of that coincided. I believe that  
19 those are -- where those numbers came from were conversations with me, Justin, and  
20 Amy Dailey.

21 Q Got it. Okay. And just -- in a big picture, how did, to the best of your  
22 knowledge, Women for America First kind of get picked as, like, the kind of the official  
23 event for January 6th, right, at the Ellipse? How did you all as a group get picked for  
24 that versus maybe another group like Ali Alexander, for example?

25 A My mom has a history going back with President Trump prior to him ever

1 seeking public office. He had reached out, I want to say, 2012, sometime in that, you  
2 know, give or take a couple of years that he had read about her in a magazine and signed  
3 something and sent it to my mom and just appreciated her work within the grassroots  
4 movement. And he had always been very complimentary and respectful to my mom  
5 and praised her work that she's done within the grassroots and conservative circles.

6 So I think that the combination of that plus, again, we're talking about some of  
7 these other players that kind of popped up that people kept trying to hit down like  
8 whack-a-mole is that the other players were seen as more fringe whereas we had built a  
9 reputation of being more mainstream and reasonable, that actually did have a track  
10 record of a following and not just, you know, taking one crazy organization and  
11 rebranding it to being another.

12 My mom started Women for Trump and chose not to go on inside the campaign or  
13 into the White House and believed that she was most effective and most comfortable  
14 working at the grassroots level like she always had. So I think that that's probably why  
15 the respect towards her and the track record that she had built.

16 Q So then help us understand, then, the extent to which the White House or  
17 Trump campaign was helping you all organize for January 6th. There's a message that I  
18 saw -- we're still on December 28th -- I know I keep coming back to that  
19 day -- where -- between you and your mother where there's a text that says the White  
20 House is involved with January 6th, but that's to be kept confidential.

21 So what was the involvement of the White House with planning January 6th?

22 A So, when I mean that, I mean that I think I said this earlier, the President was  
23 very specific. It's very commonly known, at least in my opinion, that he's very specific  
24 about music, lighting, the way that things are set up for staging for any event that he's  
25 going to. And so, when I was referencing, like, the White House or the Trump campaign

1     being looped into all of it, meaning that ESI was the event production company that had  
2     put all of that on.   So, if there was an event that the President was going to show up at,  
3     the probability, obviously, was going to greatly increase if we went with ESI.   Not only  
4     had we worked with them for the December 12th rally, for several of our things that we  
5     were doing there, but also just in general of he would feel comfortable that the  
6     production level would be to his standards, that he would go clearly with ESI being -- I  
7     don't know what it -- whether it's, like, the official vendor of his campaign or not, but that  
8     was my indication.

1

2 [3:02 p.m.]

3

BY [REDACTED]

4

5

6

7

Q So you're saying, though, that the involvement -- you said just now that President Trump liked certain types of music and certain type of, I guess, feel for his rallies. I think that's fair, but what are you keeping confidential? What are we keeping confidential here?

8

9

10

11

12

13

A That I don't want a Cindy Chafian, another type of situation that goes out and tries to, I guess, hire ESI out from under us, because, at that point, I don't even want all of the March for Trump people that have been on the buses with us to know the extent of everything that we're planning, because, clearly, people, when they see an opportunity, they take it and seize it for themselves, which goes back to the grifting comment that I made in the beginning.

14

15

16

17

And I see Cindy very much as a grifter, thinking that she could go and do something on her own. And I'm going to quickly smack down that whack-a-mole that there's a reason that you've never done something with an organization to have full control over it.

18

Q Did you all not discuss January 6th with Mark Meadows?

19

20

21

22

23

24

25

A I believe that my mom, in text messages, that I may have been on a group message between the three of us where we reached out a couple of times, again, over this whole, like, time frame. So, say, November to January 6th, about asking for the President obviously to come, sending out the invitation. There was a conversation regarding parking the buses because there was a fear of vandalism towards them that we ended up having to park them further out in Virginia. And I think that one of the conversations via text with him was regarding potentially parking them within the White

1 House property.

2 Q Okay. At this time I think on the bus tour, your driver, was it Scott  
3 Johnson? He was your driver, right?

4 A He was a driver of a support vehicle, but he was actually Dustin and Jen's  
5 personal assistant that they brought along and they paid. Women For America First did  
6 not pay him.

7 Q Did he drive you to any place?

8 A Yeah. Yeah.

9 Q Okay.

10 A He was driving one of the support vehicles also with another staff member  
11 of mine, Matt McCloskey, who was always -- I shouldn't say 100 percent of the time in the  
12 vehicle with him, but a lot of the time in the vehicle with him. So it was one person for  
13 Dustin, and then one person, you know, for Women for America First team. So different  
14 errands needed to be run or people picked up from the airport or whatnot.

15 Q And at this time, going back to Mr. Meadows, was there ever an occasion  
16 where you would call him from a phone that wasn't your phone? Like, say, you  
17 purchased a pay-to-go phone, for example, where you purchased him on any of those  
18 types of devices?

19 A Absolutely not.

20 Q Do you recall -- I believe it looks like you came back to D.C. on  
21 December 30th, or December 31st meeting. Was there a meeting at the White House  
22 that you went to that day?

23 A No, there was not. And I've seen the press reports about burner phones,  
24 and this supposed meeting with Mark Meadows none of which are true.

25 Q Okay. So when you came back on December 30th and 31st, I believe you

1 had someone from RMS, you coordinated with them to have someone pick you up and  
2 provide personal security detail, right?

3 A Correct.

4 Q And what did you do on the 31st? I guess, why did you come back to D.C.?  
5 What was so important to come back for?

6 A Well, there were a couple of reasons. Number one, traveling across the  
7 country on a bus with so many people surrounding you, it's hard to get a lot of work  
8 done, especially when you're trying, at that point, to get your circle smaller of who knows  
9 what because of what had just happened with Cindy, you know, and her trying to take  
10 our plans and manipulate and hijack our event. But then also, to just not be distracted  
11 and having to switch hotels every night, and it just was utter chaos.

12 I could not keep a clear mind when you're traveling down the road, you know,  
13 going in and out of service and trying to do media and trying to have phone calls with  
14 whomever. It was -- it was a difficult situation.

15 So I flew to D.C. and Jennifer Hulse met me there to also assist in just the  
16 workload of everything. Because with the whole permitting process and switching of  
17 everything, a lot of extra work was, unfortunately, created.

18 Q Okay. Can we pull up exhibit 58, [REDACTED], and go to -- it's page 2 of the PDF,  
19 but it's KKremer 5889.

20 BY [REDACTED]

21 Q While [REDACTED] is pulling that up, I just want to clarify -- and I know that Ms.  
22 Kremer you know about the Rolling Stone article because I know that I've seen the letter  
23 from your lawyer to Rolling Stone about the allegation having to do with the burner  
24 phones, but you can understand why we see that and we don't have -- obviously, we  
25 don't have the same sources of information necessarily that journalists do.

1           So I just want to make sure that we understand maybe facts that may have been  
2       misconstrued or misunderstood. Did you, at some point, in late December get any new  
3       phone of any kind, whether it's a prepaid disposal phone or anything like that?

4           A     Absolutely not. And your question is certainly understandable just to  
5       follow up. But I've never had a burner phone. I've never -- I've had the same phone  
6       for a while and the same phone number as well.

7           Q     And so you never directed Scott Johnson to go and buy phones for you to  
8       use?

9           A     Absolutely not.

10          Q     And so, if you were communicating with people in D.C., Ms. Pierson, other  
11       organizers or vendors or people providing services for January 6th, is there any phone  
12       other than your primary cell phone that you used to communicate with them?

13          A     No, but I will say with a caveat of, again, I mentioned earlier that sometimes  
14       these conversations would be had where it would be my mom and I sitting next to each  
15       other on speaker phone or something like that, or maybe another staff member talking  
16       with a vendor or something, but no.

17          All of my communication was on phones, either mine or my mother's.

18          Q     And I should've clarified this, I assumed, but it sounds like I was right in the  
19       assumption, how many cell phones did you have at this time period in late December,  
20       early January?

21          A     One. I still only have one. I have two cell phone numbers. One is  
22       connected to, like, my Google voice account, which was a previous phone number that I  
23       had had previously from high school, and then was, you know, kind of got it floating out  
24       there in my early days in politics. But at some point, when I got a big girl grown-up  
25       phone, no longer on my parent's plan, and got my own phone number, I still kept

1 ownership of that phone number that is routed to a Google voice number, just in case, for  
2 any reason, someone would want to reach out to me, but those are the only two  
3 numbers that I've ever had.

4 Q But only one physical phone device?

5 A Yes. Only one physical phone device, my iPhone.

6 Q Are you aware of anyone else on the Women For America First bus tour who  
7 did use any prepaid cell phones?

8 A No. I mean, I have no idea what anybody else did, but never was it brought  
9 to my knowledge or something that I saw.

10 [REDACTED] Okay. Thank you.

11 Ms. Kremer. Thank you.

12

BY [REDACTED]

13 Q [REDACTED] can you scroll down just a little bit on this page and can you see this,  
14 Ms. Kremer? And this is almost just like following up with what [REDACTED] just said.  
15 Go back up -- right here.

16 It says -- looks like you text at 12:34 to Mr. Johnson, "on the phone with the White  
17 House" and this is December 31st. Do you recall who you were on the phone with at  
18 the White House?

19 A I don't think that I was on the phone with anybody specifically. I would like  
20 to point out Scott Johnson is very theatrical. He -- what's the most eloquent way to say  
21 this? He embellishes everything. Everything you take with a grain of salt that he says  
22 because every story is just like that much bigger and grander and over-the-top that when  
23 you would talk to Scott, you would speak with him in a very much similar fashion that he  
24 is certainly kind of like class clown, so to speak, of just like everything is bigger and  
25 grander.



1           So when you told him to do something, like -- if you're, like, I'm on the phone, he'd  
2   be, like, with who? Tell me. Tell me who you're on the phone with. Next thing you  
3   know, he'd be knocking at your door, you know, if you were in your hotel room or  
4   whatever. So if you told him something that seemed important, he'd be like, "ooh."  
5   So then he would go and tell somebody. And that's just his personality type.

6           Q   Got it. And that's why we're always -- I think we kind of asked you  
7   specifically, for example, you're texting Scott Johnson --

8           A   Right.

9           Q   -- were you on the phone with the White House at this time?

10          A   No, I was not.

11          Q   Okay. So you just said that to him to get him to go away or what was the  
12   purpose of saying that?

13          A   Yes. I mean, I don't know who I was on the phone with at that point. I  
14   could have not even been on the phone and just didn't want to be -- 12:30 is midnight.  
15   So I don't --

16          Q   That was going to be my next question. If you're on the phone with the  
17   White House at 12:30, but you just said you weren't on the phone with the White House?

18          A   No. I'm saying like I doubt that I was on the phone with anybody, but if I  
19   was on the phone, I'm sure there would be a record that you guys subpoenaed with  
20   Verizon of whoever I was on the phone with would probably show you that if I was on the  
21   phone, that it wasn't with the White House, because I wasn't having conversations  
22   directly with the White House.

23          Q   So around the same time, too, right -- so you just said you weren't on the  
24   phone with the White House on December 31st. You're saying that you didn't come  
25   back to D.C. to have a meeting at the White House on December 31st, but on January 1st,

1 President Trump does retweet you, right? Does that sound --

2 [REDACTED] We can take down the exhibit. Thank you, [REDACTED]

3 BY [REDACTED]

4 Q Do you recall that, President Trump retweeting you?

5 A I don't remember the specific date, but I do remember he retweeted me.  
6 He retweeted me a couple of times.

7 Q And I believe your -- why did your mom feel the need to tell you not to use  
8 the word "calvary" in your tweet?

9 A Because she was concerned that my social media channel was one of the  
10 few that had not been yet shut down, or put on a restrictive basis, you know, where they  
11 put you on like a hold or -- I don't know the proper term to say it, but that had not been  
12 that way and she was concerned that if I did so, that they were going to accuse me of,  
13 again, trying to incite violence that Facebook had done with creating Stop the Steal, and  
14 that my account would be shut down.

15 And at that point, I believe I had over 50,000 followers or something, and so we  
16 did not need to not have access to that channel of getting messaging out --

17 Q Got it.

18 A -- to my best recollection.

19 Q No worries. Before I move on, so, to the best of your recollection, and it's  
20 December 28th, and I'll say let's just go through, like, January 4th time frame of planning.  
21 You were not speaking with Mark Meadows?

22 A No, other than the text messages that I referenced that were -- you know,  
23 that I would have been included on with my mom that she sent, but no. And the reason  
24 that she included me on messages and often times I'm sure that it seems repetitive about  
25 things was because if she was unable to answer or if I was unable to answer that

1 normally, you know, reaching out to somebody more high profile like you want to be as  
2 responsive as you can be.

3 Q Makes sense. That makes sense.

4 A But the direct relationship was back from years ago like I explained between  
5 him and my mother.

6 Q That makes sense.

7 Did you have any discussions with Mr. Eric Trump during this planning period?

8 A No, not at all.

9 Q Not at all?

10 A I don't even think we texted. I don't even think I have his number. I do  
11 have Lara's, or I did, but not with Eric.

12 Q Did you speak to Ms. Lara Trump during this time period?

13 A There were text message conversations, but not physically speaking to her.

14 Q And was it about January 6th? I don't recall seeing those.

15 A No, but it goes back to the whole thing with Scott Johnson about parking the  
16 bus at Trump in December.

17 Q Okay. We'll go back and take a look. If we don't see those -- Dave, I  
18 might reach out to you about texts with Ms. Lara Trump. What about Mr. Max Miller?  
19 Did you have any discussions with him in the lead up to --

20 A I didn't even know who that was until recently when I read it in an article.

21 Q Okay. So you weren't privy to any conversations about the sight line for  
22 the Ellipse or anything?

23 A I mean, I knew that there were discussions being had about the sight line,  
24 because I was dealing with that with Amy Dailey, but that was to the extent of my  
25 knowledge and it was worked out with Justin.

1           Q    What about Mr. Dan Scavino? Did you talk to him at all in the lead-up to  
2   January 6th?

3           A    There were a few direct messages that were exchanged via social media, but  
4   other than that, no.

5           Q    I was wondering. I was going to pull up that exhibit, but you just confirmed  
6   it for me. I thought those were from him. So I just want to confirm that. So that was  
7   the extent of your communication with Mr. Scavino were those direct messages?

8           A    Yes.

9           Q    Was there concern while you all were planning about the White House or  
10   Mr. Scavino taking over the event at the Ellipse? I believe I saw messages with you and  
11   your mother discussing this possibility, or kind of concern you all were having about  
12   Scavino taking over and then having folks like Brandon Straka or Ali Alexander on the  
13   stage at the Ellipse?

14          A    I don't specifically remember that conversation, but I know that there was  
15   conversations being had because there was a lot of concern that a tweet was retweeted  
16   by the President's account referencing Ali. It was one of his tweets, and there was a lot  
17   of speculation in, you know, just kind of gossip circles was that actually the President or  
18   was it Dan or someone else, I believe, to my knowledge that Dan was the only other  
19   person really that had kind of free rein over his account.

20          But, again, that's from the outside looking in, and I think that it was talked about,  
21   you know, does he know all of these different people, and it was confirmed that he had  
22   no idea anything about Ali.

23          Q    Okay.

24          A    And the retweet was deleted is my point.

25          Q    Correct.

1           A    And I don't know if that was President Trump's mistake or Dan's or another  
2 staffer or whose it was.

3           Q    So that would have been what triggered that conversation? Because the  
4 conversation happened around the time of the President's tweet. So just trying to put  
5 everything in a timeline.

6           A    Right.

7           Q    And you touched on this earlier, but just give us -- there's some few folks  
8 from ESI that we've seen in the planning. You've already touched on Mr. Justin  
9 Caporale. Did you work with Mr. Tim Unes at all?

10          A    Yes. He was --

11          Q    Sorry. Keep going.

12          A    It's okay. He -- I believe he's one of the owners of the company as his role,  
13 but he also was there on site the day of and he was doing the, quote/unquote, voice of  
14 God.

15          Q    Was he more of a day of planner, though? He wasn't really involved much  
16 before the day of, to your knowledge?

17          A    I mean, I knew that he was in communication with Justin or other staff  
18 members, but Justin was my main point of contact and he dealt with, you know,  
19 whatever staff of his.

20          Q    Did you deal a lot at all with Megan Powers or Hannah Salem?

21          A    A little bit, but it was, again, either under Justin or under Caroline and it  
22 became confusing at one point that I wasn't really sure who worked for Justin and who  
23 worked for Caroline. And that was confusing because then obviously on the final  
24 permit, Caroline was listed as someone that it looked like she worked for Justin and ESI  
25 when she did not. So --

1           Q    And also just to put a button on ESI. They were brought on -- ESI was  
2 brought on because you all were familiar they had done planning for presidential rallies in  
3 the past, and you were trying to just use the folks that President Trump had used in hopes  
4 that President Trump would come speak at the rally at the Ellipse. Is that a fair  
5 characterization?

6           A    Correct. And on December 12th, they had done the jumbotrons and  
7 possibly some other things, but we had a -- obviously, had a previous working relationship  
8 with them prior to that.

9           Q    And then Ms. Pierson -- I know we've talked about Ms. Katrina Pierson.  
10 Just help us understand how she even came to get involved in this rally organization  
11 planning?

12          A    So I'm not sure at what point actually she was, I guess, brought on in a more  
13 unofficial/official capacity, if that's the best way to say it, but someone who obviously  
14 has, or had a relationship with a lot of the parties that were at play, someone that my  
15 mom and I trusted very much. We have a very long history with her, knew how difficult  
16 Caroline was to work with, but Katrina also has a very just even keel personality, and is  
17 able to smooth things over in a lot of situations.

18                So she was a great liaison to be able to try her best to kind of smooth things over,  
19 but even she was not able to accomplish that goal.

20          Q    And did Ms. Pierson, was she working on a volunteer basis? Was she being  
21 paid by Women For America First? I guess I'm just trying to understand the --

22          A    No, she was not. She was just -- she wasn't being paid by Women For  
23 America First. She was merely, in my opinion, a liaison to help communication go better  
24 because there were a lot of different players, a lot of strong personalities, and a lot of  
25 people vying for control, and things needed to be taken down a few notches.

1 Q Okay.

2 [REDACTED] [REDACTED] do you mind pulling up exhibit 61?

3 BY [REDACTED]

4 Q And this is an email from Ms. Pierson to Taylor Budowich and Caroline Wren.

5 And going back to an earlier point, but just trying to figure out how Ms. Pierson fits in.

6 You see the top, the message of who it's from, the date is January 2nd. And we're

7 talking about speaker schedules, okay. And then the point that I'm really trying to

8 understand -- it looks like Ms. Pierson is discussing SCOTUS on January 2nd, which seems

9 to be the part of the program that you all might have been facilitating?

10 So, again, were you discussing with Ms. Pierson possibly the President sending

11 folks down to the Capitol and you all having the serious policy speakers at SCOTUS while

12 Ali Alexander might have had different speakers on the Capitol grounds? Like, were you

13 in conversations with her about this?

14 A Okay. So this gets a little complicated again, so please bear with me a little

15 bit. But just much like the conversation that was had earlier, until we got any final

16 permitting for anything, everything just kept continuously being talked about, whether it

17 came to fruition or not.

18 When the permit was released for Freedom Plaza, Katrina and Caroline were

19 trying to work with Cindy and Roger Stone and Alex Jones and Ali and all these different

20 people to then include like Dustin, a group of pastors that had been on the tour with us.

21 Just various other people to be inclusive so that, again, they were not being felt to be left

22 out.

23 Well, obviously, Cindy and Ali were not, and Alex and whoever else were trying to

24 be kingmaker and then but Caroline and saying, you know, that's not going to happen.

25 And so, again, this goes back to not really having full control over how the permitting

1 process is going to work, where we're going to end up the day of, and us needing to try  
2 our best and do everything that we can to keep, you know, in mind the people that had  
3 been supportive of all of our efforts along the March for Trump bus tour and for our  
4 previous two events.

5 So I would, first and foremost, ask Katrina what she meant by that, but that would  
6 be my guess because that was a potential that was being talked about because of all the  
7 dissension and chaos that was being created by all these hooligans.

8 Q So I guess to be more pointed about it. On January 4th, as [REDACTED] was  
9 talking to you about it earlier with your message with Mr. Lindell, you talked about you  
10 know that President Trump is going to send folks from the Ellipse to the Capitol. And  
11 then you also mention in that text message with Mr. Lindell that you all are going to have  
12 a stage at SCOTUS. This is the exact point, in point No. 4, from this email from Ms.  
13 Pierson on January 2nd, so I'm just going back to try to maybe refresh recollection the  
14 possibility that Ms. Pierson might have told you this plan ahead of time?

15 A I have no recollection. There were so many different contingency plans  
16 and things being talked about, but until we had the final permit, which I don't believe I  
17 got until the afternoon of the 5th, maybe even the morning of the 6th, because there  
18 were constant revisions on it, that there were so many different contingency plans and  
19 trying to just keep peace at bay with all of these other groups that were fringe without  
20 disenfranchising or making people that had been supportive of what we had been doing  
21 feel less than or that they weren't appreciated.

22 So, again, I don't recall a specific conversation that I was told that about what you  
23 were just asking.

24 [REDACTED] Okay. [REDACTED], you have any follow up on that?

25 BY [REDACTED]



1           Q    I have none on that, but I think just preceding this talking about when Event  
2 Strategies and Justin Caporale's company got involved. Do you recall who reached out  
3 to him first?

4           A    Yes. I believe that it was my mother that reached out to him back in  
5 December, maybe late November, but it was probably early December sometime when  
6 she reached out about the jumbotron for December 12th.

7           Q    And how then did they become involved as sort of full-on production -- I  
8 don't know what the right word is -- production managers, because I think providing a  
9 jumbotron is sort of a discrete service they did for December. For January 6th, they're  
10 brought on sort of to manage the whole event. And I'll tell you that we understand  
11 from Mr. Caporale's perspective he recalled being contacted by Caroline and Taylor  
12 Budowich?

13          A    So yes and no. That conversation it was kind of like crossing paths at the  
14 same time, or cars going opposite direction. Caroline Wren had been reaching out to  
15 my mom, and so much was going on around the time that I don't know whether she saw  
16 Caroline reaching out to her or it just wasn't important to my mom to respond back to  
17 Caroline. My mom had spoken at an event early on in the Tea Party days that Caroline  
18 had, I believe while she was in college, and I guess to my mom, it just wasn't important to  
19 her of like -- I don't know why she's reaching out to me right now, but whatever it is.

20                So then, when all of the stuff started happening with Cindy Chafian, and I was on  
21 the phone with Justin talking to him about, like, you know, she may -- I don't know if she's  
22 reaching out to you, if she's hired you, whatever the deal is, but, you know, that's not  
23 true, the conversation keeps rolling of what does this mean, how do we get this fixed, you  
24 know, so on and so forth?

25                And he says, Do you know someone named Caroline Wren? She's been reaching

1 out. She's also contacted me, and I think that we can work on a lot of the same efforts.  
2 Why don't you give her a call, because I know that she's been reaching out to you and  
3 your mother.

4 Q Okay.

5 A It was, basically, like ships crossing, you know.

6 Q Sure. So just to maybe rephrase it. It's fair to say that Event Strategies  
7 coming on board -- they're sort of, you know, the old comedy routine, Who's on First, like,  
8 there's a little bit of who's the permit holder and that confusion maybe is caused by the  
9 fact that there's this permitting conflict about who actually is the permit holder, and  
10 eventually it all gets ironed out, but am I understanding you right --

11 A No.

12 Q -- that they came on at the same time?

13 A No, because when I -- around the same time, but when I spoke to Caroline  
14 that very first phone call, she made it very clear that, basically, she was being fed a pack  
15 of lies from Cindy and she needed to find out exactly how to make sure that the permit  
16 did not end up with a group of crazies because then the President would definitely not go  
17 probability-wise, right, of like -- the President's not going to go to an event for an  
18 organization, the 80 Percent Coalition that never existed before, all of a sudden and a  
19 woman who's never been seen before. It didn't make sense logically of how you get  
20 from that point that she was trying to sell this bag of goods to Caroline that she really was  
21 the permit holder when it was very obvious to anybody that was in the vicinity of knowing  
22 the situation that we really were the permit holder.

23 So let's figure out how we get this done, let's bring on ESI full-time, and let's figure  
24 all of this out together and that she could be a liaison to keeping the crazies off the stage,  
25 and to still make them feel valued and like they have a role because, again, back to the

1 big tech censorship, it's taking everybody and all of their capacities and platforms to be  
2 able to get the word out to, you know, supporters across the Nation of the America First  
3 Agenda.

4 [REDACTED] Okay. Thanks.

5

BY [REDACTED]

6 Q Speaking of Ms. Wren, tell us how she came into the picture, what her role  
7 was in that beginning time frame when you're working with her? How did Ms. Wren fit  
8 into this puzzle of planning January 6th at the Ellipse?

9 A Can I actually take a break for a second before we start with this? Because  
10 I feel like this is a different segue. I just have to run to the restroom really quick.

11 [REDACTED] No worries. We'll come back on your time.

12 Ms. Kremer. Okay. Thank you.

13 [Recess.]

14 [REDACTED] We'll go back on the record now at 3:38 p.m.

15

BY [REDACTED]

16 Q Ms. Kremer, we were just getting to Ms. Caroline Wren and how she fit into  
17 the overall equation with planning in this late December, early January time frame. So,  
18 first, how did she come into the picture with working you all and then what was her role?

19 A Right. So, again, previously there was an established relationship with her  
20 and my mother regarding Tea Party stuff a number of years ago. She was known in  
21 conservative circles as a top political fundraiser for President Trump, and she reached out  
22 wanting to help fundraise for the efforts that we were obviously had been doing, and  
23 then were going to continue to be doing.

24 Q So who, I guess -- did she reach out to you and say, Hey, I'm trying to help  
25 with January 6th? I'm just trying to -- she looks like she's part of the planning team, how

1 does that happen?

2 A No. So, again, she reached out to my mom.

3 Q Got it.

4 A She had previously had her contact. You know, my mom's had the same  
5 number for a number of years, and she reached out to her to just talk to her and to get  
6 that, I guess, conversation starting to go forward. It obviously costs money to do any of  
7 the things that we were doing and wanted to see how she could be of assistance, because  
8 she believed in what we were doing and wanted to move forward from that.

9 Q So those initial conversations, it looks like, probably for most of Ms. Wren  
10 was about paying for the event. Is that a fair characterization, like, helping you all pay  
11 for the event?

12 A I think that it was just an overall what can I do to help benefit Women For  
13 America First, and to continue giving the support from, you know, grassroots and other  
14 donors from across the country that she may have had access to and to make sure, you  
15 know, again, along with Justin, to be able to have an event the caliber that the President  
16 would want to attend, and how the funds would be -- made sure that the funds, you  
17 know, could be raised that she thought that she could be of assistance with that.

18 Q At the time that Ms. Wren came into the picture, did you understand her to  
19 work for the Trump campaign or for the White House or anything?

20 A No, but it was very widely known that she was one of the campaign for  
21 President Trump's fundraisers, but again, my, I guess, perspective of her was that she had  
22 come up from grassroots Tea Party years ago, had my mom come and speak at a Tea  
23 Party in Alabama for her.

24 Q Okay. At this time, were you aware that Ms. Wren might have had, you  
25 know, a relationship with Mr. Alex Jones or with Mr. Ali Alexander? Were you all

1 tracking those relationships?

2 A I don't really track anybody's relationships, but Caroline was very  
3 forthcoming that she had spoken with other people, including Cindy, that knew that there  
4 was, I guess, for lack of better way to describe this kind of infighting, so to speak, and she  
5 wanted to see if she could be of assistance to bring everybody under big tent which, you  
6 know, we had previously tried to do in November, and I made her aware of that kind of  
7 whole situation how it panned out with Ali, and then what had happened with Cindy and  
8 that, you know, we really are amicable people, and believe that we're stronger working in  
9 collective effort, and we're not the type of organization, or personally my mother or  
10 myself, to want to, you know, have our name in lights and to be the kingmaker of  
11 everything.

12 Q So when she came in as like the big tent philosophy, you are aware that she  
13 might be working with Mr. Alex Jones or Mr. Ali Alexander when she came in and offered  
14 assistance?

15 A I wouldn't say working, I would just say I knew that she was having  
16 conversations to make sure that people were all able to kind of get behind a collective  
17 effort and message, because we all needed to be working together on the same side, if  
18 that makes sense.

19 Q Were you aware of Ms. Julie Fancelli at this time when Ms. Caroline Wren  
20 came into the picture?

21 A No.

22 Q Okay. So then just help us understand then -- I believe you received money  
23 from Ms. Wren for the Ellipse event. How did you come about receiving the \$300,000  
24 for the event? Like, tell us how that all came to be.

25 A I don't feel this comfortable discussing any of our donors.

1 Q Even Ms. Fancelli? Is that -- Dave, is that --

2 Mr. Warrington. Yeah. Look, I think you can take notice of the public reports in  
3 that, you know, they obviously have to raise money to conduct the activities that they do,  
4 but she's not going to identify any particular donors.

5 [REDACTED] It looks like [REDACTED] might have a follow-up.

6 [REDACTED] Dave, correct me if I'm wrong. For some reason, I'm having a  
7 recollection of having this conversation before, but that may just be déjà vu. Is it your  
8 position that the funding that they received related to the January 6th event -- I need to  
9 understand -- that is directly within the purview of the committee's investigation, so I  
10 need to understand exactly what objection she's raising other than I just don't want to  
11 talk about it.

12 Mr. Warrington. Well, as I'll reiterate, there's a Fifth Amendment objection, and  
13 also we would raise a First Amendment objection on that private association of First  
14 Amendment. The donor list of -- [inaudible].

15 [REDACTED] For me, it was cutting in and out for some reason.

16 Mr. Warrington. Let me see. Is this any better?

17 [REDACTED] Yes.

18 [REDACTED] Much.

19 Mr. Warrington. Okay. I think for some reason another app was trying to use  
20 my microphone at the same time. So what I was saying is, as a 501(c)(4) social welfare  
21 organization, there's no obligation for such an organization to disclose its donors, and  
22 there are also arguments under the First Amendment that that information is protected  
23 under the association of rights of donors and supporters of such organizations.

24 So I don't think that you obviously have that information from the public  
25 reporting. I don't think you need to get the same information from Ms. Kremer here

1 because she has an obligation to her own donors to protect that information, and that's  
2 consistent with the First Amendment, in addition to the issue that I raised before with  
3 regard to the committee's well-stated intention to package up cases for the DOJ with  
4 regard to fundraising activities concerning the January 6th event?

5 [REDACTED] Sir, I think you're pulling one statement out of the press about the  
6 nature of any congressional investigation that stumbles on crime would have the ability  
7 to refer that. It's obviously not the legislative purpose of the committee to investigate  
8 that crime.

9 Mr. Warrington. That's right. Identity of the donors has nothing to do with the  
10 legislative purpose.

11 [REDACTED] That's fair. And you just said that the identity of the donors has  
12 been publicly reported, and yet there's a First Amendment right to hide the identity. So  
13 we know that it's Ms. Fancelli. We know -- if you're relying on public reporting,  
14 nobody's hiding the fact that we know this donor, we know where the money came from.

15 Mr. Warrington. Then you don't know need her testimony about it.

16 [REDACTED] No, but we --

17 Mr. Warrington. You already have the information, so --

18 [REDACTED] The question of what instruction she was given in terms of how to  
19 spend that money, who told her that, how they were directed to spend those funds in the  
20 planning of January 6th, that's directly within the purview of this investigation.

21 Mr. Warrington. That actually wasn't the question. Okay. If that's the  
22 question, the spending the money we're not arguing with. We're happy to talk about  
23 that all day long.

24 [REDACTED] So her position is, she just can't confirm the donor is Julie Fancelli?

25 Mr. Warrington. That's right.

1           [REDACTED] So if we ask her about communications in terms of who spoke with  
2 her about giving her funds to spend on this rally -- and I'll tell you what. Let's do it this  
3 way: [REDACTED] you finish your questions, then I'll ask mine, and then we'll go systemically  
4 through which financial questions she's raising objections to, because I think that will  
5 streamline the process. So I don't want to derail your questioning. Let's just -- we'll  
6 bifurcate it that way.

7

BY [REDACTED]

8           Q So looks like, Ms. Kremer, with Ms. Wren, for example, she was part of the  
9 whole compromise for the January 5th event at Freedom Plaza, and the January 6th event  
10 in keeping speakers separate. Is that a fair characterization?

11          A What do you mean by "compromise"?

12          Q Okay. Help us understand how the event on January 5th came to be with  
13 different speakers? It seems like Ms. Chafian's organization was kind of running with  
14 that event and then your event on the Ellipse. Tell us how that came about.

15          A I mean, I wasn't working with Cindy Chafian at all so I can't tell you what the  
16 dialogue was with Cindy, who is the permit holder and anybody else.

17          Q Ms. Kremer, you released the permit for Freedom Plaza for that event?

18          A I released -- I released the permit to Park Service, and they then chose to  
19 issue it to Cindy Chafian. It wasn't that I released the permit, then the holder to be  
20 Cindy Chafian. I just released it in general, and she was the next one in line, based on  
21 what I've seen from the outside.

22          Q So you never received any direction that the White House wouldn't let you  
23 keep the permit for Freedom Plaza and the permit for the Ellipse? That was never part  
24 of the story leading up to January 6th?

25          A No. I mean, I actually talked about that earlier that it was the pressure



1 from the Park Service that they were too big of things that I didn't have the support staff  
2 that I needed to accomplish such two huge events. Therefore, I needed to pick one.  
3 And I was not going to jeopardize the permit for the Ellipse to make sure that I held on to  
4 the permit at Freedom Plaza. It was a lot of work that went into the execution of the  
5 event at the Ellipse just as it was previously for our November and December events.

6 [REDACTED] [REDACTED] can we pull up exhibit 52?

7

BY [REDACTED]

8 Q This is going to be a group chat which includes you and Pastor Gibson. And  
9 once that gets up, I'll give you a chance to read the message. And we're going to go to  
10 KKremer 3340 at the top of the page. And this is on December 31st where you say the  
11 White House wouldn't let me keep the permit and keep the 6th.

12 So I'm just trying to understand now why are you saying --

13 A I mean, when I'm saying, like, White House, National Park Service, whatever  
14 official entity -- I mean, it wasn't specifically the White House.

15 Q Okay. So -- okay. So what you're saying here today is, when you used the  
16 term White House in some text message, you could be referring to NPS as well?

17 A Well, no. What I'm saying is, at that point, sure, I could have basically gone  
18 to bat with NPS, and had to prove to them that I had the support staff that I could handle  
19 two events, and I could have done that. But I also knew that there was an effort to keep  
20 at bay the issues that were being had with Ali and Alex and Cindy that they needed some  
21 sort of platform to be speaking, and Roger Stone included in that; that they needed some  
22 sort of platform to speak at so they didn't screw up our event for January 6th.

23 And they had the potential to be serious liabilities and create a lot of confusion  
24 and dissension within the grassroots supporters across the Nation that would not know  
25 the difference of how to tell anything about this.

1           And the whole premise of all of this was to support President Trump and the  
2           efforts that were being had by grassroots' people all across the Nation to see and make  
3           sure that our free and fair election was being held, and that we had election integrity, and  
4           that every legal ballot that was cast was counted, and every illegal ballot that was cast  
5           was thrown out or dismissed.

6           So I think that goes in line with everything of saying, I could've put up a fight with  
7           NPS and sure, legally, I'm sure that I could've held two permits at the same time. I  
8           obviously held two permits previously at -- on November and December for the march  
9           permit, and also for Freedom Plaza. I had the ability and capability with my staff to hold  
10          an event on January 5th at Freedom Plaza, but I was just trying to take the path of least  
11          resistance and knew -- logically, I understood that there needed to be a platform for the,  
12          quote/unquote, "crazies."

13          Q     Okay. I just want to make sure I'm tracking this.

14          [REDACTED] [REDACTED] now can we pull up exhibit 7.

15          BY [REDACTED]

16          Q     Which is your text messages with your mom and can we go to page KKremer  
17          5513, because this isn't the only place where we see it. You're talking to your mom,  
18          again. This is December 30th at the bottom of the page on 5513, right here, [REDACTED]  
19          thank you. You say, I need you to answer -- you're talking to your mom -- it's the  
20          campaign I'm calling with?

21          And then about, what, 6 minutes later, you say, "They want us to release the  
22          permit for Freedom Plaza." I interpret "they" as the campaign. You're saying here,  
23          today, NPS is telling you about pushing back on you. Help me just square that.

24          A     Right. That's clear.

25          Q     It's clear -- it's clear from the message that you're referring to NPS here and

1 not the campaign?

2 A Correct. Based on what I just told you that NPS is the one that issues the  
3 permits, how could the campaign or the White House tell me what I had to do when  
4 they're not the ones issuing the permits.

5 Q So in your text messages when I'm reading about the permits and you say  
6 White House or campaign, you are not referring to the White House or the campaign. Is  
7 that fair for me to say?

8 A I'm saying it needs to be taken in full context of whatever the rest of the  
9 conversation is being said. I can certainly go through that line item by line item should  
10 you need me to, but I think that it is important to keep whatever your specifically asking  
11 about in context.

12 Here, what I'm telling you, "They want us to release the permit for Freedom Plaza"  
13 is NPS, and I've explained that. I'm sure legally that there could have been something  
14 that I could've pushed back and said, I have every right to hold both permits, and I'm first  
15 in line for both permits, but --

16 Q Let's go a minute later -- let's go a minute later then. You say, "I need an  
17 entirely separate team, and 125 grand to keep Freedom Plaza. The campaign wants me  
18 to release it." So what I'm hearing from you, NPS is telling you, you need 125 grand to  
19 keep the Freedom Plaza, or is it the campaign telling you this?

20 A No. What I'm saying is the campaign -- and when I'm saying that, I don't  
21 know that that's the proper way to even say that. It's that Katrina at that point was  
22 saying just release it. Who cares about Cindy Chafian? Let her have it. That's fine.  
23 I don't think Katrina was actually part of the campaign at that point. I think she had  
24 already been released. But what NPS was telling me was that I basically need to have a  
25 separate team in order to do it.

1 Well, I had that team, right? I had the rest of my March for Trump staff that was  
2 traveling across the country that could've taken the entire permit for Freedom Plaza, but I  
3 needed an additional minimum of \$125,000 to pull off a whole other separate event.

4 Q Got it. Okay. So Ms. Pierson, then, was involved in telling you to release  
5 the permit as well?

6 A Well, she was just saying why are you going to bat about this with Cindy.  
7 Like, she doesn't matter. She -- you know, the reason that Katrina was brought in was  
8 trying to help smooth things over by the mess that Caroline had created by -- that people  
9 basically fall in line were her aggressive personality and that I know everything.

10 So when Katrina came and got involved, Caroline had created a much bigger mess  
11 than was even happening in December with the whole Ali and Alex. She helped  
12 facilitate the whole issue that came to be with Cindy Chafian and the whole permit was  
13 with Alex Jones. And when you feed a beast, don't be surprised when they come  
14 roaring back at you.

15 And that's what Caroline funneled. She was fueling a beast that giving them any  
16 sort of recognition when no one should have paid any mind to what they were saying or  
17 doing.

18 Q Okay.

19 A So Katrina was brought on in that capacity to help smooth things over, and  
20 at that point it was people trying to do damage control to try and keep Caroline at bay,  
21 and the rest of the other crazies because at that point, Caroline was lumped into that,  
22 especially after she threatened me with Kimberly Guilfoyle and Don, Jr.

23 Q So going back to the January 5th event that you had said that Ms. Chafian  
24 was --

25 A I can't hear you. I'm sorry. I don't know what's going on.

1 Q I believe the 703 number might be off mute now.

2 Thank you.

3 So going back to the January 5th event, it was held by Ms. Chafian, but Women  
4 For America First, you all had a block of speakers for that event, didn't you?

5 A It was a loose block for March for Trump, the people that were unable to  
6 have a place on January 6th that it was made in a goodwill effort that was facilitated by  
7 Katrina to, again, be inclusive of everybody and appreciative of everybody's efforts.

8 Q Okay.

9 A So I don't know exactly how that came to be about. I know that I certainly  
10 supported that because I thought that it was wrong to cut people out, but I didn't have  
11 any communication regarding specifics of that.

12 Q So it was Ms. Pierson that probably worked that out with Ms. Chafian's  
13 event? It wasn't you working it out with Ms. Chafian?

14 A My best guess would be that it was a combination between Caroline and  
15 Katrina, but I don't have any direct knowledge.

16 Q And you also have said that -- you just said that you weren't -- actually, let  
17 me just ask it. Were you working with folks like Wild Protest to put on the rally at the  
18 Ellipse?

19 A Wild Protest was Ali, so no.

20 [REDACTED] Can we pull up exhibit 4, [REDACTED]?

21 Ms. Kremer. While he's doing that, I'm going to blow my nose.

22 [REDACTED] No worries.

23 Mr. Warrington. And I'm not raising my hand to speak; I'm just getting a little  
24 sore.

25 [REDACTED] I think we're all feeling that way after sitting all day, Dave.

1           And just to the top part with the coalition partners. Perfect. Thank you, [REDACTED]  
2       You can zoom out a little bit.

3           Ms. Kremer. Okay.

4           BY [REDACTED]

5           Q     All right. So this is website, can you zoom out a little more [REDACTED] This  
6       looks like your website, the March for Trump website for the Ellipse.

7           A     I believe so.

8           Q     And you can zoom back in, [REDACTED] The reason why I'm asking about Wild  
9       Protest, if you go to Coalition Partners, you see Wild Protest, you see Stop the Steal right  
10      there, but these are groups that you are saying had no affiliation with your event. So  
11      help us understand what's on the website?

12          A     Correct. So this is, again, a Caroline issue that she created. I connected  
13      her with -- and I believe that Katrina was in on these conversations as well -- connected  
14      everybody with Scott Graves, who has, again, done all of our tech stuff, and the  
15      information that was given to him was to put this under our Coalition Partners, at which  
16      point I lost my ever living mind for numerous reasons.

17          Number one, Stop the Steal. Number two, Peaceably Protest. There was kind  
18      of an issue with the Phyllis Schlafly Eagles, based on Ed Martin's actions regarding Ali and  
19      what previously had happened. So I was not thrilled about that, but most importantly  
20      was the Tea Party Patriots part of this. And the reason that that was such an issue is  
21      because we are still in ongoing litigation that's been 10-plus years now where the  
22      leadership of Tea Party Patriots, Jenny Beth Martin specifically had board calls where they  
23      discussed how to try and destroy my mother, and created fake aliases on -- fake aliases  
24      on social media where they went and said that my stepfather raped me, that my mother  
25      was complicit in it. And when I wanted to report it to the police, my mom sent me to go

1 live with my father. None of which were true, and it went to trial. One of the cases  
2 went to trial.

3 My stepdad was awarded over \$1 million in litigation fees because it was so  
4 litigious, and then they went and moved the money from one entity to another, so he's  
5 never seen a dime of it.

6 So to think that not only the public thinks that we're going along with Stop the  
7 Steal and Wild Protest, but then, to add in the extra dagger of Tea Party Patriots, you  
8 must be off your rocker to think that we would just be okay with that. And when my  
9 mom found out about it, because I obviously called her while she's on the bus holding  
10 these other rallies across the Nation, I mean, there was some real issues that were being  
11 had there because my mom felt like I wasn't standing up for my family at that point; that I  
12 would just say, Oh, I'm just doing it for the greater cause. And it was, again, a Caroline  
13 directive whatever and what I believe to be the case is that she was accepting money for  
14 these organizations from them to them, something, made promises that she had no  
15 authorization to make, and did so at our detriment, which was a consistent pattern with  
16 Caroline.

17 Q But if it's a Women for America First event and this is your website, explain  
18 to me how Caroline Wren can even get these coalition partners listed on your website?

19 A Right. So when we're trying to work all on the same team, and I connected  
20 them with Scott Graves, it was sent to him at some point. And Scott was not nitpicking  
21 of going through all the details. I mean, he was just trying to get everything -- we were  
22 all trying to triage and get done what we could get done. We were all drinking from a  
23 fire hydrant. And so when it was up there -- I mean, then it was quickly taken down.

24 I mean, Katrina was trying to explain to everybody, like, why -- this went beyond  
25 just what Caroline wanted to paint as just like a hissy fit that I didn't like Ali, or Alex Jones,

1 or Cindy Chafian. This went -- took things from a whole separate level that goes back to  
2 the beginning that she had no respect, that -- "she" meaning Caroline had no respect, was  
3 trying to have control and to take over our event and thought that she could bully the  
4 leadership of Women For America First, and that was not going to happen.

5 Q So leading into January 6th, did you have any security concerns about your  
6 event at the Ellipse? And if so, just tell us what they were.

7 A Many concerns, specifically with BLM and antifa knowing what had  
8 happened around the time of our events on November and December when the different  
9 law enforcement agencies were staging them in certain areas, and knowing that there  
10 were going to be other events popping up and we hadn't previously had an event at the  
11 Ellipse. Obviously, that was a concern.

12 And then also, Alex Jones personally threatening me, which obviously I filed a  
13 police report. And then the rhetoric that Ali and Alex Jones were fueling about, you  
14 know, Amy and Kylie being Ms. Piggy and misappropriating funds, stealing the Stop the  
15 Steal, all of that.

16 I mean, it was a combination of all of those things, plus the BLM and antifa, which  
17 was probably the first and foremost front, and then also just the social media things from  
18 other people with death threats and whatnot.

19 Q So it was the counter protesters and then it sounds like Mr. Alex Jones and  
20 Mr. Ali Alexander, but it was the things they were saying about Women for America First,  
21 not like them saying 1776 or anything --

22 A Oh, I mean, that was an issue. And I had a phone call -- I don't remember  
23 when it was, but there was, at some point, either -- I think it was before January 6th, but  
24 there's a potential it could have been before December 12th, with an officer specifically  
25 about Alex and Ali and the things that they were doing, that he reached out to me, or I



1       was given his number, however, the conversation came to be --

2               Q     Sergeant Burnett?

3               A     Yes.

4               Q     Okay.   So you talked to Sergeant Burnett about these security concerns  
5       with Ali Alexander and Alex Jones?

6               A     Yes.   And, again, echoing them on the Zoom calls and then individual calls  
7       with other people, but I remember that one with Sergeant Burnett that sticks out to me  
8       specifically.

1

2 [4:06 p.m.]

3

BY [REDACTED]

4

Q And what specific security concerns were you forwarding to Sergeant

5

Burnett?

6

A I don't know that I specifically sent any security concerns. I know that I

7

connected him with Detective Ellis so that she could fill him in on what was going on.

8

And then also I connected him, I believe, with people at RMS so that they could kind of fill

9

in the details; but I wasn't privy to those conversations.

10

Q But, to my understanding, that might have been more about your threats

11

from -- the threats you were receiving from Alex Jones and not necessarily the language

12

that Ali Alexander or Alex Jones would have been using, or was it everything?

13

A No, it was everything. And, actually, when I spoke with Sergeant Burnett, I

14

was in a meeting with the general manager of the Willard Hotel, Markus Plat, going over

15

security concerns and letting him know what was going on, looping in their, you know,

16

head of security because, you know, you could only get into the hotel if you were a

17

staying guest. But Ali and Alex were staying at the hotel, and they were with a lot of

18

fringe people, and that was very much a concern.

19

So those two conversations -- I actually stepped aside. I was actually with

20

Jennifer Hulse and Markus Plat in the hotel lobby at the Willard, sitting down near the

21

fireplace when I got up and had the phone call with Sergeant Burnett and then continued

22

the conversation with Markus Platt after my phone call concluded.

23

Q And who are these fringe people that you were concerned about that Alex

24

Jones and Ali Alexander were around?

25

A I mean, I can't give you a specific date, but around the events of all of this,

1     there were nights when Alex Jones would be rallying with people outside, I believe it's  
2     maybe the JW Marriott.   Is that, like, downstairs, kind of next to the Willard?   And  
3     there were a bunch of, like, just fringy type people.   I don't know if they were specifically  
4     Proud Boys or whatever, but the things that they were yelling and screaming and then the  
5     police would have to come or law enforcement of some sort was coming to break them  
6     up and, you know, they were using bullhorns.

7             And it just seemed like a potential to get very much out of control and were being  
8     pumped up by Alex and Ali and, you know, the chanting of like give me death or give me  
9     liberty -- give me liberty or give me death, or whatever.   I mean, there were so many  
10    things that were being said or pushed out via social media that were just concerning.  
11    And we wanted nothing to do with that and wanted to make sure that, you know, our  
12    supporters that were more mainstream were not getting lumped into being a crazy  
13    extremist.

14            Q    That's perfect.

15            [REDACTED] [REDACTED] can we pull up exhibit 60 for me?

16            [REDACTED] Sure.

17

BY [REDACTED]

18            Q    So, going along the same lines of Mr. Alexander, Mr. Jones' "give me liberty,  
19    give me death," 1776 rhetoric, help me understand then -- help me square it with your  
20    email to Jason Cole, needing more battle-esque music; right.   And this is from December  
21    30th.   So it looks like you are talking about a video for the actual rally, and you were  
22    requesting more battle-esque music.

23            And so I just don't see the light between the two messages with Ali Alexander and  
24    Alex Jones and then this email that you sent on December 30th.

25            A    Right.   So something that's just like more, like, you know, "The Patriot," the

1 movie, that falls in line with that of, like, that people are, you know, pumped up and feel  
2 courageous, that they are going to stand up and have their voice heard and fight for  
3 something, and that is election integrity.

4 And when I say "fight," I don't mean that in a physical way. I mean that you're  
5 going to demand transparency, and if we can't have a free and fair election and, you  
6 know, feel confident in that, then what does our vote mean?

7 So I wanted something that is like the second sentence says, "or another upbeat  
8 option but not the one that's chosen." And that's what I was trying to convey as, like,  
9 something, "The Patriot" movie.

10 Q Which, just to be clear, that was like 1776, right?

11 A Sure. I mean, I -- honestly I don't even know who's in that movie, but I can  
12 think that -- isn't Mel Gibson? Like I see --

13 Q It's a great movie, yes.

14 A I don't think I've ever seen it.

15 But my point -- my point was just something that is encouraging, that makes feel  
16 people feel, like, very strong, Braveheart-esque. I'm not a movie buff, so I don't know.

17 [REDACTED] Okay. Does anyone else have any follow-up?

18 [REDACTED] you can take that down.

19 Any followup before I move on?

20 Mr. Warrington. I would have gone with the theme "The Gladiator," but that's  
21 just me.

22 Ms. Kremer. Okay. That's actually probably a better one. What's the movie  
23 where they are on the boats with Troy --

24 [REDACTED] I do have one followup question maybe then.

25 [REDACTED] Not about Troy I'm assuming, right?

1 [REDACTED] No, but only because multiple movies -- I mean, Dave kind of jumped  
2 in with another gladiator-like battle movie.

3 BY [REDACTED]

4 Q I guess my question is, you know, having seen some of the promo videos of  
5 what was going to be shown on January 6th, and I think there were multiple -- I think  
6 there was an email that you wrote about the battle music. I think there was a text you  
7 sent about more battle music. And, like, I'm just thinking of some of the things that you  
8 said earlier about Georgia being a concern because Ali Alexander was there and they  
9 went into the Capitol, and then you knew that things were unexpected.

10 I mean, was there any concern or discussion about riling up a bunch of people  
11 with battle music and getting them all kind of, like, keyed up over a stolen election and  
12 then sending thousands of people to march to the Capitol? Was there any discussion  
13 about, should we use battle-like music in this situation or --

14 A No.

15 Q I guess I --

16 A When I think about the battle music that I'm talking about, you know, I  
17 would say that I'm sure that the people in 1776 weren't expecting to how the movie  
18 industry portrays with battle uplifting music that makes people feel patriotic. I mean,  
19 there are numerous songs. You can also, like, go into singing more like opera style. I  
20 mean, I'm probably not even using the correct words to say that. But how the movie  
21 industry depicts certain things -- I mean, courage is something that I was trying to  
22 exemplify with saying that, something that just makes you feel, like, patriotic, that you're  
23 standing up for something and encouraged.

24 Q No. I get that.

25 [REDACTED] And, [REDACTED] if you're covering this later, I don't want to jump ahead.

1 We can leave it. I don't want to get out of order.

2 [REDACTED] No, it's fine.

3 BY [REDACTED]

4 Q I do want to go back, though, to something.

5 You did mention that Ms. Wren was threatening you regarding Ms. Kimberly  
6 Guilfoyle and Mr. Donald Trump, Jr. What are you referencing there?

7 A There was a phone call with Jennifer Hulse and myself with Caroline, and  
8 she was at Mar-a-Lago. I didn't know it at the time, not that that matters. But she was  
9 at Mar-a-Lago with Kimberly and Don. And when we were having this discussion,  
10 because I said, you know, "When are we going to go over different kind of ideas about  
11 potential speakers," -- and this was kind of early on -- she was, like: There is no  
12 discussion. I don't even know why you're calling me. I mean, she was basically like  
13 puffing her chest up to me, saying, like: I'm sitting here with Kimberly and Don, and  
14 they are going to be aware of your behavior, and, you know, so on and so forth, and you  
15 have no control over this situation, and blah, blah, blah.

16 And I'm like: I don't care who you're sitting with, but it's very clear obviously  
17 your perspective now. I'm, like, thank you. Have a nice life, like, I will not be  
18 communicating with you anymore.

19 I mean, it was to rude and aggressive that Jennifer and I were honestly so taken  
20 aback, and it was just -- it was shocking. I don't even know if Jennifer said anything on  
21 that call because she was so aggressive and shut me down to even discussing anything.

22 But it was very much she was trying to flex her relationship with them, when I  
23 could have given a crap about who her affiliation and relationship was with.

24 Q Got it. Thank you.

25 [REDACTED] And sorry, [REDACTED] I know I cut you off. I know you were still

1 asking questions.

2 Ms. Kremer. And she -- I would like to add on that she made that very apparent  
3 numerous times to me about her relationship with Kimberly and them being best friends.

4

BY [REDACTED]

5 Q Yeah, I guess -- and I apologize. I just want to go back for a second --

6 A That's okay.

7 Q -- because I'm kind of -- I think something you said that is a little  
8 important -- actually, I think it's really important -- is, a moment ago, you said, well, of  
9 course, you would want patriotic music or uplifting music. But, on multiple occasions,  
10 that's not actually what you said. You said battle music.

11 And what I can't wrap my head around is how there's this entire conversation  
12 thread, you, your mom, Katrina, all talking about how concerned you are that Ali  
13 Alexander and Alex Jones bring something terrible to the table because you guys are  
14 doing one thing, and they bring this vitriolic narrative, this, you know, violence; they've  
15 entered the Capitol. And there's this, like, distinct, well, we're trying to keep these  
16 separate.

17 But, at some point, you know that there's going to be a march. You're making  
18 videos, and you're using battle music. And, in all of the time that you're planning this,  
19 there's just never any consideration or discussion about what happens if we rile up  
20 50,000 people with battle music? Because I have seen "The Patriot," and as it turns out,  
21 they slaughter a bunch of people in that movie.

22 So, like, when you say battle music versus patriotic music, those are really  
23 different connotations, like, those are really different words.

24 Mr. Warrington. All right. Hang on a second.

25 Look, I think we're going -- now we're talking about song selection as like being

1       problematic. I -- this --

2       [REDACTED] Let me rephrase my question.

3       Mr. Warrington. I mean, this music selection is really -- I don't know what -- I  
4       mean, she explained what she meant by battle music. To her it's --

5       [REDACTED] No, no. I get that.

6       Mr. Warrington. -- patriotic music and stuff like that. And you're trying to link  
7       it with motivating people to go raid the Capitol or something.

8       [REDACTED] No, no, no. That's not what I'm doing.

9       What I'm asking you is, were there ever conversations that you remember having  
10      about consequences, ramifications, the risks of using battle-like music or riling all of these  
11      people up and then having them march to the Capitol? And what would happen --

12      Mr. Warrington. You're linking the two. So you're saying the choice of the  
13      music and riling them up. That's like --

14      [REDACTED] Right.

15      Mr. Warrington. It's like the music is riling people up. Are we seriously talking  
16      about -- are we going to, like, this is what Congress wants to get involved in and find out if  
17      you chose the "Battle Hymn of the Republic" versus the theme song to "The Patriot"  
18      versus "Let the Bodies Hit the Floor"? Was that the problem with what happened on  
19      January 6th? I mean --

20      [REDACTED] I can totally understand why you would say this, and I do get that.

21      But, having said that, our job, believe it or not, is to investigate all of the facts, as minute  
22      as they may seem, as trivial as they may seem, to ask the questions about what were  
23      people thinking, what discussions were they having, what were they considering.

24      Because here's the thing: Part of what people don't realize is our job is not just  
25      to investigate what happened on January 6th. It's, is there oversight needed, or are



1       there conversations that need to be had about whether regulation should be put into  
2       place to prevent the next January 6th?

3               Mr. Warrington.   Okay.   So don't play Metallica on the Mall.   I mean, is that  
4       what you're saying?

5               [REDACTED]   I don't know.

6

BY [REDACTED]

7               Q     But here's the thing, my question is, on multiple occasions, when you're  
8       having the discussion of battle-like music, was there any -- ever a discussion about should  
9       you do this to 50,000 people who are riled up and are about to march to the Capitol?  
10      That's all I'm asking.

11              Was there ever a conversation about the risks of getting a bunch of people riled  
12      up with battle-like music and then sending them to march to the Capitol?

13              A     I will say this.   When I hear the music that was chosen for our commercial,  
14      it does not make me think that people are going to be slaughtered in what you said of  
15      whatever movie that I told you I hadn't even seen before.   Have you, [REDACTED] ever  
16      seen -- listened to the original version that I'm saying that I want a different, more  
17      uplifting song, upbeat, battle-esque compared to the final version?   Have you listened to  
18      the two differences?

19              Q     Do not get me wrong.   I totally understand.   I have a workout music that,  
20      without which, I literally can't work out.   So I absolutely get the idea of tying music to  
21      motivation, and this isn't necessarily like a criticism.   Your video was really good.   It  
22      was very upbeat.

23              But what I'm asking you is, on multiple occasions, when you were using the term  
24      "battle-like," which you used in email and you used in text, given your concerns about Ali  
25      Alexander and Alex Jones and the possibility of violence and not wanting to be associated

1 with these guys at the Capitol who could be doing something stupid, was there ever any  
2 discussion of, gosh, as 50, 60,000 people register for this event, what's the tone -- I mean,  
3 what's the environment that we're setting for them as they march to the Capitol?  
4 Because that --

5 A I think the choice for you should probably be more with Hollywood than it  
6 should be with the choice of music that a women's organization selects and what  
7 connotation you believe that that has. I mean, I don't know what else to give you other  
8 than saying the upbeat -- I'm very proud of our video, and I thought that Benny and his  
9 team did a great job on what they produced.

10 Mr. Columbo. I also just want to voice a little bit of a concern with compound  
11 questions that are flipping between music, videos, tones. So the questioning is getting a  
12 little confusing about what exactly you're asking.

13 [REDACTED] Actually, I think Ms. Kremer's answer was actually really helpful  
14 because the answer is: No, we didn't think it would matter, we didn't think it was an  
15 issue. And it almost sounded like you're saying it really wasn't your place to worry  
16 about it.

17 Mr. Columbo. You're talking about the choice of music specifically --

18 [REDACTED] We're going to -- it's all good. Let's -- we want to keep it  
19 moving.

20 [REDACTED] Yes. I want to keep the time moving. And to be honest, like, I'm  
21 good for right now given the answers.

22 [REDACTED] Okay.

23

BY [REDACTED]

24 Q So the next, Ms. Kremer, you're aware there was a January 4th meeting at  
25 the White House with Ms. Pierson and the White House, correct, about the speakers for

1 January 6th?

2 A Yes, sir, I am.

3 Q And how did that meeting come about? Like, why was there a meeting  
4 that Ms. Pierson had to fly in from Texas to meet at the White House about the speaker  
5 list?

6 A I have no idea exactly how that all came to be about. I was just told that  
7 she was going in to have a meeting with him, and it would -- all of the facts would be  
8 presented about the different people that had put in or expressed wanting to speak and  
9 that he would be the one to be making the final call.

10 Q All right. So it sounds like, though, that -- you said everyone who wanted  
11 to speak. Were there actually disagreements about who would actually speak on the  
12 6th?

13 A Not as far as, like, Women for America First goes. But, I think that, again,  
14 just trying to be all-inclusive and to -- maybe a way to put Caroline and Alex and Ali and  
15 Cindy in their place of saying, like: You guys have been trying to do all of this and run  
16 interference the whole time, and it really had no sway on anything other than just to  
17 create chaos because you wanted to be kingmakers.

18 So he was still presented with the information, and I believe, like, his comment, I  
19 was told when he -- when Katrina said Ali Akbar or Alexander, whatever his name is, that  
20 he didn't even know who he was.

21 So I think that it just was a way to say, like: Here's the facts, here are all the  
22 people that want to be a part of it. And it was, like, okay, moving on.

23 Q But --

24 A She was trying to be inclusive, just to give him the options of things that  
25 have been saying on social media and to let him know all the people that had been

1 organizing events and doing stuff and given the best, you know, resources that were had  
2 at the time, then they made the best decision in that meeting of who best represented  
3 the President's views and what he wanted reflected on that day.

4 Q Yeah. But I -- so that all makes sense.

5 So what I'm trying to understand, though, is if it's a Women for America First  
6 event and there was no disagreements from Women for America First about who should  
7 be speaking, why is there a meeting at the White House about the speaker list? Is it  
8 because Ms. Caroline Wren was talking to the White House about speakers?

9 I guess, we're just trying to understand why there needed to be a meeting at the  
10 White House about the speaker event if it's your event?

11 A No. I think that there -- from my opinion, there was probably a lot of  
12 dissension and people, you know, trying to go to the kids and whining and complaining,  
13 and it was probably -- there was a lot of chatter that was so unnecessary going on.

14 And I assume that Katrina's thought process was, well, let me just go to him  
15 directly and talk to him. Let's figure out what he wants, so that, again, we can have the  
16 highest probability that he actually does show up and step out on that stage, because at  
17 any point he could have said, like, no thank you. And we wanted it to be a successful  
18 event for the hundreds of thousands of grassroots activists that had shown up from every  
19 end of the country.

20 Q Okay.

21 A This wasn't about one organization or one, you know, person trying to be  
22 kingmaker, which all of these other people that we keep incessantly talking about were  
23 trying to make it be. This was about a free and fair election and wanting to hear what  
24 the Commander in Chief of the United States, his perspective as President.

25 Q Right. So the purpose of the meeting, what I'm hearing from you, was to

1 go over the speaker list with President Trump in hopes that he would approve certain  
2 speakers and increase the likelihood -- or keep the likelihood about the same that  
3 President Trump would actually speak on January 6th? Is that a fair characterization?

4 A I, again, go back to what I was saying about how he has a particular aesthetic  
5 that he likes, wanting to make sure that there was not anybody that he wanted or didn't  
6 want that was, you know, part of our thing.

7 I mean, I'll be honest with you, I really didn't have any intention of speaking. I  
8 didn't want to speak. And I said to Katrina: The only thing that I really hope that  
9 comes out of this meeting is that my mom gets a chance to speak because she's, you  
10 know, worked so hard for all of these years. And -- but other than that, I didn't know  
11 until -- I don't even know what time officially I was told, but the evening of the 5th, early  
12 January 6th that I was even speaking, and then I was super nervous because, prior to  
13 November, I wasn't really a public speaker. I mean, I'm good at it, and I'm able to. But  
14 I don't like to be in the limelight like that.

15 So the whole thing was just completely asinine that we were even talking about  
16 that Ali and Alex Jones were even trying to put themselves at the same level as the  
17 President, like they had every right to be there.

18 Q And, going back to Mr. Alexander, I don't believe -- he wasn't cut off the list  
19 after the January 4th meeting, was he? He wasn't cut off the speaker list, to your  
20 recollection?

21 A I'm sorry? After the what meeting?

22 Q After the January 4th meeting in the Oval Office, was Mr. Alexander cut from  
23 the speaker list by President Trump then?

24 A To my knowledge, because he didn't even know who he was.

25 Q Okay. Got it.

1 But this was all -- everything that you would have known was coming from  
2 Ms. Pierson, kind of like in a debriefing from Ms. Pierson?

3 A Um, to the best of my knowledge, yes.

4 Q And this is the same meeting, right -- I'm just confirming -- that the speaker  
5 list was reduced to, like, three Representatives of Congress and three Senators speaking?  
6 Is that --

7 A I know that there were several kind of rounds that they went through. But,  
8 you know, I wasn't at this meeting, so I don't know. All I know is what I experienced of  
9 who actually spoke on stage that day.

10 Q Got it. No. That's all we can ask is what you recall.

11 [REDACTED] [REDACTED] real quick, can we pull up exhibit 37 and go to K. Kremer  
12 4499?

13 And I just want to get your color on something that you said, I believe, to  
14 Ms. Jennifer Hulse. And this is a group chat with Ms. Hulse and your mother and you.

15 Mr. Warrington. What exhibit did you say again, [REDACTED]?

16 [REDACTED] The exhibit is 37, and we're going to go to the Bates ID K. Kremer  
17 4499.

18 BY [REDACTED]

19 Q So it looks, at this point, it's the morning of January 5th. If we go actually a  
20 page before, so 4498, at the very top, you're asking about, like, the National Anthem.  
21 This is the morning after the meeting in the Oval Office. And then you also on 4499 say:  
22 Did Katrina tell you when the list will be released?

23 Your mother says: No. Puts us in a pickle; right?

24 And then you respond: Not really. Gives us plausible deniability.

25 [REDACTED] [REDACTED] hold on a second. [REDACTED] is scrolling.

1 [REDACTED] Sorry, [REDACTED] 4499.

2 [REDACTED] Okay. I'm just making sure I'm in the right place here. 4499?

3 [REDACTED] Yep, right there, right there.

4 [REDACTED] Right there, okay.

5

BY [REDACTED]

6 Q So you say -- your mom says: Puts us in a pickle, right?

7 And then you say: No, not really. Gives us plausible deniability.

8 What were you getting plausible deniability from?

9 A Specifically there I was talking about Dustin Stockton because he was a  
10 ticking time bomb, and if I didn't know what the speaker list was, I couldn't tell him  
11 whether he was speaking or not, and I wouldn't have been lying to him because he was  
12 literally about to lose his ever-living mind because he has a God complex.

13 [REDACTED] And can we go to the top of this page, [REDACTED]? So just scroll up  
14 because it's the same conversation, 7 a.m. Right here.

15

BY [REDACTED]

16 Q Around 7:46 a.m. your mom says: For some reason, Caroline is catering to  
17 Ali. She has caused some major problems with the White House.

18 And this is all the morning after this meeting at the Oval Office.

19 What are the issues that Caroline is causing at the White House with Ali?

20 A I think that it's just creating dissension and fracturing the grassroots of  
21 where people are supposed to show up, what they're supposed to be doing. Ali was  
22 very vocal on social media about his perspective of the Kremers are awful; you shouldn't  
23 support Women for America First. It just was creating issues.

24 Q But how was it creating issues if the White House specifically or if the  
25 President didn't even specifically who Ali Alexander was?

1           A    I mean, you would have to ask my mom.  She's the one that wrote that  
2 text.

3           Q    That is a fair answer.  No, I just want to make sure -- so we're trying to  
4 figure out what you know.  So, if we have to ask your mother, that's perfectly fair.

5                Thank you, [REDACTED] for that exhibit.

6           And do you recall the Breitbart article that came out on January 3rd with the  
7 speaker list?  Do you recall that coming out?

8           A    Um, the one that I think that you're referencing, I guess it was January 3rd or  
9 whatever.  Do you have it that you can show it?

10          Q    Yeah, we can pull it up.  It's exhibit 50.

11          And I just want to -- my very high-level question about this was, like, what was  
12 your reaction to the article?  Who did you all believe at the time might have been the  
13 source of this article?  That's all I was trying to gather about it.

14          A    Oh, well, who wrote it?  Was it Matt -- did Matt write it?

15          Q    Yes.

16          A    Yeah, Matt Boyle.  I was, obviously, furious when this came out because it  
17 was not truthful whatsoever.  I contacted Matt and told him that he needed to take it  
18 down.  He refused.  And I was livid because who else had the authorization to say that  
19 other than for it to be the White House themselves to confirm speakers or for our  
20 organization as the event was falling under our permit.

21          And it was -- I don't know who told me at what point -- I think that it was well  
22 after January 6th that I learned that it was Caroline who leaked it and was given every  
23 indication that she was paying Breitbart to publish this.

24          I was also told at different points that Don, Jr., was aware of the situation.  It  
25 made him and Kimberly kind of get into it and that Don, Jr., called Matt Boyle specifically



1 to tell him to take it down, and he wouldn't even do it then.

2 Q Okay. And this is because --

3 [REDACTED] Oh, does anyone have any followup on that, the Breitbart article?

4 BY [REDACTED]

5 Q Do you recall any discussions about having the National Guard come to the  
6 rally on January 6th after this meeting in the Oval Office on January the 4th?

7 A I don't specifically have any recollection of that. I mean, obviously, I've  
8 been told afterwards that it was requested; but I don't have any recollection of any of  
9 that. I mean, you're trusting the Federal Government to make sure that things are taken  
10 care of, would not be in my realm of things that I should be responsible for.

11 Q And going back, why was Donald Trump, Jr., upset about the article? I  
12 mean, what upset him about that, to your recollection?

13 A I think that Caroline was overstepping the boundaries and playing up her  
14 situation, relationship, whatever, with Kimberly.

15 Q And who told you this about Mr. Trump, Jr., being upset about it?

16 A That's what I was just saying. I cannot remember who said that, who told  
17 me that it was Caroline that leaked the -- and actually it might have been Matt Boyle  
18 himself that said Don called me.

19 Q Got it.

20 And you said that there was, like, tension between Mr. Trump, Jr., and  
21 Ms. Guilfoyle over this article?

22 A I didn't see that. That's what I was told.

23 Q And what specifically about the article, though, made Mr. Trump, Jr., upset  
24 about it?

25 A I think because there was utter chaos going on about what seems like all of

1       these different groups vying for legitimacy and to be kind of the kingmakers and that this  
2       just gave credence to people that it shouldn't have been given credence to.

3               Q     Got it.

4               A     But that's just my inference.    I mean, I don't -- I didn't hear that  
5       conversation.   I don't know.   I didn't talk to Don, Jr., so --

6               Q     Right.

7               Was it -- did it have anything to do with the fact that it mentioned, for example,  
8       President Trump sharing the stage with people like Ali Alexander, for example?

9               A     Can you go back to the article and I'll read it?   And maybe that will rejog my  
10      memory.   And if you can pull it up, and, again, I'm going to blow my nose.

11              [REDACTED]   And we can go to page 2, [REDACTED]

12              [REDACTED]   And I'm sorry.   Can you just remind me of the number of the  
13      exhibit?

14              [REDACTED]   Sure.   It's exhibit 50.

15              [REDACTED]   50, okay.

16              [REDACTED]   The first two paragraphs is what we're focusing on.   And you can  
17      scroll down a little bit because I do want her to see -- the first two paragraphs of page 2.  
18      Sorry.   I wasn't clear.   And right there is perfect.

19              Go back up.

20              There.

21              BY [REDACTED]

22              Q     So, Ms. Kremer, it says here -- I just scrolled down a little bit to the part -- to  
23      a specific section.   But it says, This article right here by Mr. Boyle says that the event is  
24      being hosted by Women for America First.

25              And then the next paragraph goes into how the main event will be -- will happen

1 at the Ellipse at the White House.

2 And then the paragraph below that talks about, you know, Ms. Kimberly Guilfoyle,  
3 Ms. Amy Kremer, Rudy Giuliani, Katrina Pierson, but then also mentions people like Ali  
4 Alexander, Roger Stone, et cetera.

5 Like, do you recall if this was a part that made Mr. Trump, Jr., upset about the  
6 article or what his thoughts were on that?

7 A No. I thought that it would maybe trigger a memory or something about  
8 specifics, but, no. I mean, looking at this list, though, some of the people, Kimberly,  
9 Benny Johnson, I mean, why would they be speaking? They hadn't spoken at anything  
10 previously. I'm not knocking them saying that. I'm just saying, like, this is all of a  
11 sudden the first time we're hearing it. It's just a weird compilation of how this came to  
12 be.

13 Q But these are some of the names that were on the list that Ms. Pierson took  
14 to the White House on January 4th, though.

15 Do you recall that?

16 A I don't know what official list she took with her. I believe that she compiled  
17 it of every name that had been floated out by every single person that had a grievance  
18 and felt like they should be included.

19 Q Okay.

20 A Because she was trying to be comprehensive.

21 Q Got it.

22 A Present the facts and then let the chips fall where they may.

23 [REDACTED] Does anyone have any followup after that?

24

BY [REDACTED]

25 Q Okay. Before January 6th as well, did you have any insight into speeches

1       that were drafted? Did you help with any talking points, or anything like that?

2           A     No, sir, I did not.

3           Q     You didn't have any coordination to the President's speech for January 6th?

4           A     No, I did not.

5           Q     And did you know of -- like, I guess, even the morning of January 6th, what  
6       was going to be in his speech, including like marching to the Capitol or fight, any language  
7       like that?

8           A     No, I did not.

9           Q     How about your speech? How did you draft it? Did you have anyone  
10      assist with it or just draft it yourself?

11          A     I did it based purely on adrenaline and whatever I felt in the moment  
12      because I was dealing with a dumpster fire that Caroline had created that morning of not  
13      allowing our people in, not giving us the credentials, changing all of our VIP seating,  
14      creating just even more havoc than she had already created. I couldn't even get into the  
15      speakers' entrance -- and I was the name on the permit -- because Caroline was telling  
16      people not to allow me in. And so I had to -- literally, we had to go completely around  
17      the opposite direction, drove the golf cart with one of the people that was driving golf  
18      carts that morning from the Willard, jumped off -- well, went as far as the golf cart could  
19      go because it was a sea of people and then literally jumped off and sprinted, and one of  
20      my security guys was behind me, but I mean, my hair was pulled, I was slapped, hit.

21                When I got to the magnetometers, they were, like, whoa, whoa, whoa, ma'am.  
22      And I was, like, somebody better figure this out because I'm supposed to be speaking very  
23      soon, and I can't even get into my event. And I'm pretty sure that I said some  
24      explicitives, because I was furious.

25          Q     So you didn't receive any talking points, though, for your speech?

1 A No.

2 Q Did you all as an organization or individually provide any, I guess, talking  
3 points or recommendations or suggestions -- the reason why I use "recommendations or  
4 suggestions" is because you talked about how President Trump operates -- for President  
5 Trump's speech?

6 A Not to my knowledge, not from me.

7 [REDACTED] Anybody else have anything else before I move on to the day of,  
8 to January 6th?

9 BY [REDACTED]

10 Q Okay. You just touched on this a little bit on arriving. When did you  
11 actually get into the Ellipse? I know you said you had a hard time getting in. Do you  
12 know, approximately, when you actually got into the Ellipse?

13 A I do not.

14 Q Okay. But I guess in relation to when the program started, was it closer to  
15 when the program started? Was it like --

16 A Yes, because I was in a very much disheveled, hurried rush, and it was  
17 freezing cold outside. My hair, makeup were getting kerfunkled running through a sea  
18 of people, and I was just very disheveled and upset.

19 Q Got it.

20 Who did you go to the Ellipse with that morning?

21 A In the golf cart, it was Matt McCluskey, who was on the Women for America  
22 First team driving it. I had a security guy, Tre, with me; my boyfriend; and my  
23 grandmother.

24 Q Got it.

25 And RMS Security was event security and personal security for you all on

1 January 6th?

2 A Yes.

3 Q And they also had individuals stationed at the Supreme Court that morning,  
4 right, RMS?

5 A I believe so, but I don't know. I mean, I don't -- I wasn't involved with the  
6 more specific details of what was going on at the Supreme Court. My mom would have  
7 better details about that.

8 Q Okay. And, along the same lines, would your mom have had better details  
9 about who was scheduled to speak at the Supreme Court other than, it looked like Mr.  
10 Lindell, like any other speakers? Would that have been your mom that was coordinating  
11 that for the Supreme Court?

12 A Yes. But, again, there was no, like, specific itinerary or anything like that.  
13 It was going to basically be, for instance, Diamond and Silk. Right. We brought them  
14 up there specifically to speak, and then they weren't going to be speaking. Were they  
15 upset? They were very upset and had some very choice words for me, and, thankfully, it  
16 was smoothed over. But, I mean, why would people spend their time and efforts to go  
17 support an effort and then be basically slapped in the face of, like, you're not worthy?  
18 Because that's what it seemed like, the picture that was being painted by a lot of the  
19 actors that we keep talking about.

20 Q And so, when you first arrive, were you there at the Ellipse while the issues  
21 of Ms. Caroline Wren and the VIP seating was going on?

22 A That happened before I got there. I think it probably continued a little bit  
23 while I was there, but it primarily happened before I got there.

24 Q And just -- I think we've seen it before, but just provide any color about that  
25 situation. Was it really just about Ms. Wren trying to get certain people into VIP? Just

1 help us -- provide your contact with that situation.

2 A She was putting -- I mean, I'll -- for lack of a better way to say it, she was  
3 putting all the crazies right in front, putting people that she felt were important, whether  
4 they were donors or just high-profile people in front, in the very front rows when,  
5 number one, she was not our only fundraiser for the whole March for Trump, Women for  
6 America First since we've been in existence. So she didn't know who was important or  
7 not important.

8 And certainly it was incredibly disrespectful and, quite frankly, hurtful to the team  
9 that had been traveling across the country for the last however many weeks, and they  
10 were in the fifth or sixth row because Caroline Wren decided to make that decision, when  
11 it must be nice when you're sitting at Mar-a-Lago sipping on champagne, being BFFs with  
12 Kimberly Guilfoyle, when there are other people out there doing the hard work, and you  
13 slap them in the face because you're clearly an elitist, Caroline.

14 Q Were you aware of any Oath Keepers getting into the VIP area at the Ellipse?

15 A I have no idea who actually was or was not in the VIP area because we never  
16 saw the lists that were given to whatever different checkpoints because Caroline  
17 circumvented all of that and went to people directly herself.

18 Q And I know, on the day of, a few folks started -- spoke that I don't believe  
19 previously planned to speak like Mr. Giuliani, Mr. John Eastman, Mr. Vernon Jones. Do  
20 you have any insight into to how those individuals were selected to speak that day?

21 A I'm not sure. I know that, obviously, Mayor Giuliani had been, you know, a  
22 very outspoken advocate and friend of President Trump, and then also Vernon Jones,  
23 similar, but he also came to our previous events, you know, and was a speaker.

24 So I don't know how those exactly all came to be approved or disapproved. I  
25 mean, at that point, it was, you know, President Trump's call. I know that people were

1       having hissy fits because they felt like they should even be allowed back stage, and, you  
2       know, it was just an issue.

3               Q     Along --

4               A     I had no control at that point.    It was, like, okay.

5               Q     I get it.

6               Along the same lines, did you come to hear why Mr. Roger Stone didn't even  
7       attend the event?

8               A     I have no idea.

9               Q     Okay.

10              A     I mean, he's a little kooky, and I don't even know.    There was a battle  
11       between him and Ali at some point about who created "Stop the Steal," and then him  
12       bashing me and my mom for trying to steal it from Ali.    I mean, it was like this whole  
13       false narrative that was taking place that was far from what actually reality was.    And  
14       these people, you know, get it in their minds that, just because they say something, it  
15       becomes factual, and that's obviously not true.

16              Q     Right.

17              Did you speak with President Trump at all before his speech that morning?

18              A     I did not.

19              Q     Any members of the family that morning, did you speak with any of them,  
20       the Trump family?

21              A     Nice like pleasantries with Kimberly, Laura, possibly Eric.    I don't think I  
22       talked with Don Jr., but, I mean, I don't know.    We were all kind of in the same vicinity.

23              Q     Right.

24              A     If anything, it would have just been, like, very surface level, hello, how are  
25       you, take a picture type deal.



1 Q Got it.

2 Were you under the impression that morning of January 6th and even during  
3 President Trump's speech that he was going to go to the Capitol afterwards?

4 A Well, he obviously indicated in his speech that he was going to be marching  
5 right there with everybody. He said that.

6 Q Got it.

7 But before that, were you under the impression -- and even as he said it, was that  
8 news to you? Like, did you come to expect it? What was going on?

9 A I think -- not to reiterate, but expect the unexpected from him, so no real  
10 expectations.

11 Q Do you know why President Trump ended up not marching to the Capitol?

12 A I was told for security reasons; that he really did want to and had every  
13 intention of doing so, but whoever made the call, I guess it would be Secret Service, that  
14 it was unsafe and deemed it not appropriate.

15 Q Okay. There was a text message between you and your mother around  
16 12:53 where you said that you were horrified about what just happened with Alex and Ali.  
17 What were you referencing? What happened with Alex and Ali around the  
18 middle of the day that you were horrified about?

19 A So it was, I believe, if my timeline makes sense, that that was probably  
20 during the President's speech. And that is when -- also, I would like to note that, like,  
21 Caroline, when she moved the seats around, put Alex Jones and Cindy Chafian sitting right  
22 behind me, I mean, again, just like another slap in the face and trying to exert control.

23 And they got up and went and stood right in front of us. I was in the front row  
24 with my grandmother and my boyfriend, a friend from California, and, you know,  
25 whoever else was around me. And Alex and Ali and their little minions all stood up in

1 the middle of the President speaking, like gearing up to leave, and Caroline was a part of  
2 that, of, like, getting them up and getting them. And I was just annoyed that -- first of  
3 all, the disrespect, being right there in the couple of front rows with the VIPs, listening to  
4 the President of the United States. And, again, you have this God complex that you're  
5 more important than to listen to what the President of the United States has to say.

6 And then, also, they were just standing in front of me. I didn't understand why.  
7 It was just like a very weird situation, and it was rude.

8 Q Got it.

9 Did you hear -- kind of staying with Mr. Alex Jones and Ali Alexander, did you hear  
10 anything about Alex Jones marching or leading the march with the President to the  
11 Capitol Building? Were you aware of anything of that nature?

12 A Um, I know that Caroline was trying to facilitate them getting out based on  
13 the conversation being had there. And I don't know because I really don't know the  
14 difference -- and this sounds so bad, but I met a lot of people. It was either Megan  
15 or -- Megan Powers or -- what was the other girl's name? Maleny --

16 Q Mulvaney? Maggie Mulvaney?

17 A Um, maybe. I don't know. There were a number of women I had either  
18 previously met or didn't really know who they were that were working with Caroline that  
19 were -- just seemed like all buddy-buddy with her throughout the whole day that were  
20 coming out and pointing -- you know, directing Alex and Ali moving in front of the crowd  
21 because they had to walk across basically the whole front of the front line of the VIP.  
22 And Cindy was trying to go with them, and Alex told her no and to sit down, and she was  
23 pissed off.

24 Q Do you recall the Secret Service helping escort Ali Alexander, Alex Jones out  
25 of the Ellipse?

1           A    They certainly were not.

2           Q    Okay.  When did you become aware that there was violence going on down  
3 at the Capitol?

4           A    Not until later, after we had gotten back to our hotel and were trying to  
5 defrost and kind of, like, come down from that -- you know, kind of just excitement of just  
6 being at this massive rally with all of these people from all across the Nation.  So I think  
7 probably 1:30.

8           Q    So, when you got back to the Willard -- because weren't you supposed to go  
9 to SCOTUS afterwards?  If I recall correctly, didn't your security team kind of call off you  
10 all going down to SCOTUS?

11          A    But, again, remember, earlier in our conversation, I talked about no one  
12 really had the intention of going?  I mean, it was freezing.  I don't know what the  
13 temperature was, but it was so cold.  We had barely slept for the 2 or 3 hours that we  
14 did the night before.  We had been on the buses leading up to this, working so many  
15 exhaustive hours.  It was a miracle that we got the event pulled together the way that  
16 we were able to.

17               We never had any intention of going down there.  I know that there was a report  
18 that said something in one of the Rolling Stone articles about how we were supposed to  
19 stay at the Ellipse until Congress was completely done.  I mean, it was just all farcical.  
20 No one ever had that intention, and it was freezing outside.

21               So, again, the stage at SCOTUS was kind of a fallback for any of the people that we  
22 were dealing with that had been supporters that were going to be disgruntled and to give  
23 them the option, if they wanted to continue down that way, go right ahead.

24          Q    Again, that's all fair.  I guess what I'm just trying to pin down is you don't  
25 recall your security team, for example, saying, "There's violence at the Capitol, we're not

1 doing the event down here at SCOTUS"?

2 A No. I had my grandmother with us. We had just lost my grandfather. It  
3 was freezing. My boyfriend kept taking off his jacket to put over my grandmother's  
4 many layers. We were exhausted, hungry, tired. I mean, it was just -- we wanted to go  
5 back to the hotel because, at that point, we had accomplished what we set out to  
6 accomplish, right, putting the pressure on some of these Congressional Members that  
7 they change the way of contesting the electoral college about verbally what they were  
8 saying they were then going to go and do, to contest the electoral college there and  
9 present different evidence, of which I don't know what that was, but -- and there was  
10 nothing else for us left to do.

11 We kind of, like, put all of our chips on the line and now wanted to see whatever  
12 evidence was going to be brought forth and shown to the American people without the  
13 filter of the media.

14 Q So you get back to the hotel, the Willard. I guess, what were you all doing  
15 as you were watching the coverage? What was the mood? I'm assuming you guys  
16 were all kind of together, but what was the mood?

17 A Sorry. My AirPods died.

18 The mood in the hotel?

19 Q Yeah. As you were watching the coverage, what were you all thinking?  
20 What was the mood?

21 A Um, at first, it was excitement, again, coming off of that, you know,  
22 exhilarating rush of just seeing the President speak, all of these people that, I mean, just  
23 went for as far as the eye could see, and just very proud of ourselves coming off of these,  
24 you know, two bus tours, the other events.

25 I ordered a ton of French onion soups to the hotel room, and we were all kind of

1       like defrosting.

2               Q     Gotcha.

3               A     And it was not until later when things, you know, obviously progressed as  
4       the media was reporting that we were seeing, and it became very serious.

5               Q     Did Women for America First put out a statement that evening about -- tell  
6       us how that came about.   Tell us how that came around.

7               A     It was the leadership of Women for America First, me, Jennifer, and my  
8       mom, and Chris Barron, who has done our PR.

9               Q     Did you quote any of the Trump campaign at all in the message that you all  
10      put out?

11              A     I don't believe so, not to my recollection.

12              [REDACTED]   Does anybody have any followup about January 6th in particular?

13              [REDACTED]   Just really quickly.

14              BY [REDACTED]

15              Q     Did you happen to have any role in coordinating any of the buses?   Did  
16      Women for America First have anything -- let me rephrase the question.

17              Did Women for America First have anything to do with coordinating the buses that  
18      brought people to attend either January 5th or January 6th?

19              A     So I think the distinction needs to be made that you're not talking about the  
20      March for Trump bus.   You're talking about, like --

21              Q     Apologies.   Not your actual bus that brought you there, like, not the tour  
22      bus that we've been talking about, but like the efforts to coordinate all of, like, the  
23      crowd-building buses that would bus people in to attend the rally?

24              A     No.   I mean, there was talk of that being done via Caroline, but I have no  
25      idea of what actually was done or not done.

1 [REDACTED] Okay. Thank you.

2 [REDACTED] All right. Dave, I think this is a good spot for us just to do like a  
3 quick -- we can come back at, like, 5:05 just to make sure -- we'll talk and make sure we  
4 didn't miss anything, next steps, our next questions, and then we'll just come back on  
5 after that. I think this is a good spot to stop real quick for a quick break.

6 Mr. Warrington. How much longer do you think you have because I've got that  
7 West Coast --

8 [REDACTED] I know. Yeah, I think we can talk about that and then come back  
9 and give you a clear roadmap of where we're headed if any more topics.

10 Mr. Warrington. Okay. Yeah. 5 minutes? Come back at 5 o'clock?

11 [REDACTED] Yes. Let's come back at 5 or right after 5.

12 Mr. Warrington. Okay.

13 [REDACTED] All right.

14 Mr. Warrington. All right.

15 [Recess.]

1

2 [5:04 p.m.]

3

BY [REDACTED]

4

Q The time is 5:04.

5

Just real quick, I think you said it earlier, but I want to make sure I heard you right.

6

You didn't go to a meeting at the White House on December 31st, correct?

7

A No, I did not.

8

Q Okay. After receiving this subpoena from us, did you talk to any

9

Congressional Members or Mr. Meadows about it?

10

A No, I did not.

11

Mr. Warrington. Sorry to interrupt, but [REDACTED] could you -- I think Mike dropped

12

off again. I think he's trying to get back in.

13

[REDACTED] Got it. Just added him back.

14

Mr. Warrington. All right. Thanks. Sorry.

15

Sorry, [REDACTED]

16

[REDACTED] No worries.

17

BY [REDACTED]

18

Q You were answering, Ms. Kremer, about reaching out to congressional

19

members or Mr. Meadows after receiving the subpoena from us?

20

A Not to my recollection. I think that at some point, when things became

21

public, there may have been conversations with a few different Congressional Members,

22

but I don't really have any specific recollections of any of that. I know that there were a

23

couple that tweeted things out in public support of us holding a legally permitted rally,

24

but I can't recall anything specifically. If there's something that you're asking about, I

25

mean --

1           Q    No. Just, like, did you have any conversation with Congresswoman  
2 Marjorie Taylor Greene, for example, about the subpoena?

3           A    Yes, I did. She does a lot of stuff with Women for America First, so she  
4 speaks at our events frequently. I also -- my home State's Georgia, and she's a  
5 Congresswoman from Georgia, so she's a friend of our family's.

6           Q    And did you, like, share any communication with us with her or anything like  
7 that?

8           A    If they exist, then I shared them with you guys.

9           Q    Okay. I guess just big picture-wise, we talked a lot about the planning after  
10 the December 12th rally up to January 6th. We all know what happened on January 6th  
11 with the breach of the Capitol and folks going down. Help us -- or how would  
12 you -- what would you tell us if we were to ask, like, how can we stop it from happening  
13 again, like another January 6th-type event where people breached the Capitol, right?  
14 You threw the event. What types of recommendations would you have for us as a  
15 committee that we should consider on trying to prevent this from happening again?

16          A    I don't really know that I'm qualified to answer that because I'm not a  
17 security analyst, but I think listening to intel that is being given, and to act in the best  
18 interests of the American people and to not pay -- play party politics. I would like to see  
19 the January 6th Committee subpoena records from Pelosi's office, Adam Schiff's office,  
20 Swalwell's, a number of people from, you know, the Democrat side, because I believe that  
21 there were a lot bigger-picture orchestrators that were playing hands in this or sending  
22 directives, maybe not officially, but in roundabout ways to create chaos, like with the  
23 permit not being allowed to march.

24               I think that there were a lot of nefarious things that were being spoken about that  
25 were coming down from Pelosi's office. I mean, I can't -- I don't understand how when



1 requests were made for the National Guard, why you would deny that. Wouldn't you  
2 rather be safe than sorry, that should violence erupt, or a bad situation, that you're more  
3 than prepared. And it seemed that the reason that that was not done was because this  
4 was orchestrated from a lot of other people that were much higher up.

5 Q Okay. Thank you.

6 [REDACTED] [REDACTED] I believe you have some questions.

7 [REDACTED] Yeah.

8 BY [REDACTED]

9 Q And Ms. Kremer --

10 Ms. Kremer. Sorry.

11 [REDACTED] That's okay.

12 Ms. Kremer. I'm so sorry to interrupt you.

13 [REDACTED] No, no.

14 Ms. Kremer. Do we know how much longer? Can we set a time limit? I think  
15 we're all really tired and --

16 [REDACTED] Yeah, I know. I'm going to try to keep this so that we're done by  
17 5:30. Is that okay? Is that -- does that work for you?

18 Mr. Warrington. Is that for, like, we'll all be done by 5:30?

19 [REDACTED] I sure hope so. I think that's the plan.

20 Mr. Warrington. That will help with my west coast situation.

21 [REDACTED] Yeah. I will tell you. I doubt that a lot -- well, I hope that a lot of  
22 my questions are a little bit more direct and not as contextual, and so, we should be able  
23 to keep them tight and just kind of roll through them.

24 Mr. Warrington. Okay.

25 BY [REDACTED]

1           Q    The one thing that I will say is, you know, Ms. Kremer, you indicated earlier  
2   that as it pertained to certain areas of the financing, that you had Fifth Amendment  
3   objections. So to the extent that you have that pertaining to the question I'm asking,  
4   just go ahead and raise that, and we'll just roll through the questions. So if that's your  
5   answer, just say that, and we'll move on.

6           A    Okay.

7           Q    Okay. So you just have to -- you have to speak for the record so the court  
8   reporter can get it down.

9           A    Oh. I'm sorry. I did say okay.

10          Q    Oh. Sorry. That was -- that must have been my headphones. Apologies.

11                So I did want to talk with you about -- and I understand we're not going to talk  
12   about the donor. There was public reporting, and we believe -- obviously, we  
13   understand that there was one donor, and that a certain amount of funds went to you for  
14   the purpose of planning this event. But I wanted to talk with you about the process by  
15   which leading up to January 6th, did Women for America First do fundraising to put  
16   on -- either to put on the January 6th event, or in relationship to the January 6th event?

17          A    I mean, are you trying to ask about our specific fundraising practices?

18          Q    Yes. So earlier, I think you mentioned Anodot, and our understanding is  
19   that there were either emails or communications or maybe Facebook posts, I can't  
20   remember, but there was fundraising regarding the January 6th event.

21          A    Well, you guys brought up Anodot because you were giving me an exhibit of  
22   something that was tweeted out with an Anodot link. I mean, that is a fundraising  
23   platform that we previously used.

24          Q    Right. And so what I'm asking about is did you do fundraising related to  
25   putting on the January 6th -- funds that you needed for the January 6th event? Were

1     you asking for funds related to the buses, planning the January 6th event? Did you do  
2     fundraising for that, Women for America First?

3           A     We fundraised all the time for Women for America First. I mean, it takes  
4     money to put on events of any kind, so --

5           Q     Okay. What I'm asking very specifically is from the time that you were  
6     aware that the January 6th event was happening and you were planning to participate,  
7     did Women for America First do fundraising to raise funds to put on or help put on that  
8     event?

9           A     So I very clearly understand what you're saying, and what I'm telling you is  
10    that we fundraise all the time because just because our event on January 6th was coming  
11    up, it was going to pass, and Women for America First would still exist as an organization  
12    that would still need to be funded to continue on any sort of path forward for any future  
13    events. So, I mean, take that as you will, but we fundraise for a lot of different things.

14          Mr. Columbo. Is the question not any of the fundraising was earmarked solely  
15    and specifically just for the event?

16          [REDACTED] So what we -- what I've seen and what I was asking about was it  
17    looked like there were fundraising emails that were going to D.C. on January 6th. We  
18    need money for buses. We need money for -- like, it was about January 6th. I was  
19    asking, did they do fundraising in regards to funds needed for January 6th?

20          Mr. Columbo. Yeah. You know, as someone who counsels organizations that  
21    raise funds, I'm not sure how -- it's as clear as you want it to be. I mean, organizations  
22    will typically say, We're doing the following things. Please donate. That's a little bit  
23    different than another situation as a factual and legal matter when you say, I need money  
24    for this, and you're putting it in a separate account, and it's specifically earmarked for that  
25    purpose.

1 [REDACTED] Okay. And that's --

2 Mr. Columbo. The websites speak for themselves, but it's different from saying if  
3 you send us this money, it's only going to be used for this purpose. I'm just offering that  
4 as a legal observer, so to speak.

5 [REDACTED] So that's super helpful, and if that helps, let me rephrase the  
6 question.

7 BY [REDACTED]

8 Q Ms. Kremer, did you earmark any funds for January 6th?

9 A I believe that it just went into general fund for us.

10 Q Okay. And do you remember -- to the extent that you did fundraising after  
11 the election, before January 6th, do you remember how you would have asked for those  
12 donations, and by that, I mean like the actual mechanism, like emails, texts, Facebook?  
13 Like, what was the fundraising mechanism that you used or maybe the better way is the  
14 communication mechanism you used to raise funds?

15 A All of the above of what you just mentioned.

16 Q Okay. I will have to go back and look at that because I literally just forgot  
17 my list.

18 Just out of curiosity, can you help me? I don't really do fundraising, but the  
19 Anodot platform, does that do all those things, or are they all separate things that you  
20 have to, like, manually do?

21 A It depends, and sometimes you do collaborative efforts with people. I  
22 mean, there are numerous ways that funds are raised. Sometimes it's by hiring a  
23 fundraiser. Sometimes it's by sending an email or a text message. It just depends on  
24 whatever platform at the time is being used, and we use numerous platforms to raise  
25 funds for our organization.

1           Q    So let me be clear. I am asking about a very specific window here, so  
2           whatever you used before the election is not relevant to what I'm asking about. I'm  
3           literally asking about from the date of the election probably until January -- we'll just say  
4           until the end of January. But post-election to the end of January, can you remember  
5           what fundraising mechanisms you used?

6           A    There were numerous. I cannot give you specifics. I would have to go  
7           back and look at the different things, but I mean, there were a lot of different  
8           mechanisms that we used.

9           Q    Yeah. And I --

10          A    I know you're looking for specifics, but I can't give those to you because I just  
11          don't have those on the top of my mind right now. I was getting ready for this --

12          Q    But you actually literally read my mind because the next question I was going  
13          to ask you is you probably don't know numbers off the top of your head. Is there a  
14          person that if we wanted to ask about how much was raised, et cetera, who did your  
15          finances at Women for America First?

16          A    That was done in-house, and I'm not willing to discuss numbers of what was  
17          raised by donors.

18          Q    Okay. And on the same Fifth Amendment --

19          A    Yes, ma'am.

20          Q    -- objection? Is that what you're saying? Okay.

21          And did you guys have revenue sharing agreements with any other organizations?

22          A    Sorry. You broke up when you were saying that. I don't know if it was on  
23          your end or my end, but I believe that you were asking if there was revenue sharing with  
24          any other organizations? Yes, there was.

25          Q    And can you tell us who those organizations were?

1 A Not off the top of my head.

2 Q You don't remember any of them?

3 A I do not.

4 Q Can you tell us the person -- I believe a moment ago, you said that the  
5 finances were handled in-house. Can you tell us who the person is who did the in-house  
6 financing?

7 A That's something that numerous people in-house would work on.

8 Q Is there a Finance Department or an Accounting Department at Women for  
9 America First?

10 A No.

11 Q So who are the numerous people that would work on it?

12 A Myself, my mother, and Jennifer Hulse. We have an accountant.

13 Q It's an in-house accountant or an outhouse -- sorry. I just said outhouse.  
14 Apologies. An outside accountant.

15 A Well, I understood what you meant, and I said outhouse too, I think. It's a  
16 separate entity.

17 Q Okay. And when you -- I think you said this a moment ago. When you  
18 raised money, I believe you said it all went into one Women for America First account?

19 A I don't -- honestly, I don't have, off the top of my head. I believe so, but I  
20 would need to go back and pull all of this.

21 Q Okay. Were you ever de-platformed from any of the fundraising sites,  
22 or -- I don't want to say big tech. Were you ever de-platformed from any of the  
23 payment processors or fundraising sites or anything that you used for fundraising?

24 A Yes.

25 Q Which ones de-platformed you?

1           A     Anodot, Facebook, Mailchimp, just off the top of my head. There were  
2     probably others. Those are the first that come to mind.

3           Q     And when they de-platformed you, did they give you any explanation for  
4     why?

5           A     I would have to go back and look that up.

6           Q     Okay. And are you able to say what mechanism you use for fundraising  
7     now if you've been de-platformed from those platforms?

8           A     I would need to go back and check. We've switched companies numerous  
9     times relating to what we use and our donors, and I think that there are multiple,  
10    different outlets that we've been kind of working on of getting, like, a new fit.

11          Q     So just let me be clear here because I think it helps to understand. One of  
12    the things that we're looking at as we're investigating both what happened on the 6th  
13    and then afterwards is the issue of some of the C(4) organizations, or political  
14    organizations being de-platformed, right, and what happened. So it's not just about  
15    what happened on that day in terms of the ramifications. There are organizations who  
16    now have limited abilities to raise funds, right, so that's also something that we're looking  
17    at. So that's why I'm asking these questions was to just find out if you were one of the  
18    organizations that was impacted by the de-platforming. I just thought some context  
19    might be useful there, or otherwise, it seems very weird. But to the extent that you  
20    remember or can provide additional information, or if that's not something that was in  
21    your production that you would be willing to share, we would appreciate that. That  
22    might not have seemed responsive at the time, but if it's something that you didn't  
23    include, that would be really helpful.

24          I just want to go back to questions about how the event was financed. In terms  
25    of instructions, were you given any instructions as to how to spend the money that you

1       were given? I believe it was \$300,000. Were you given any instructions as to how to  
2       spend that money for January 6th?

3           A     Can I -- can we take a break? I know we're, like, trying to get to the end,  
4       but I would like --

5           Q     Oh, sure.

6           A     -- a break. Okay.

7           Q     Yeah. Absolutely. Do you want to --

8           A     Do you want to say 5:25, or do you just want me to go offline and then come  
9       back?

10          Q     Yeah. Why don't we just come back when you come back? How about  
11       that?

12          A     All right. Thank you.

13          Q     Perfect.

14          [Recess.]

15          [REDACTED] We're back on the record at 5:36.

16          BY [REDACTED]

17          Q     Just the question that [REDACTED] was referencing was whether you were ever  
18       contacted by law enforcement about the January 6th events? Did you interview with  
19       them, provide them materials, anything like that?

20          A     Are you asking after January 6th?

21          Q     Correct.

22          A     No. I have never been contacted by any law enforcement.

23          Q     No DOJ or FBI or anything like that?

24          A     No, sir. I have not been.

25          Q     Okay. Thank you.



1           [REDACTED] I believe that's all I had, and Ms. Wick is done as well. Then we'll  
2 come back. We might have a future discussion, but we'll stop at 5:37 for now.

3           Ms. Kremer. Thank you.

4           [Whereupon, at 5:37 p.m., the interview was concluded.]

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15

Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

\_\_\_\_\_

Witness Name

\_\_\_\_\_

Date